WatfordFC safeguarding

COMMUNITY SPORTS & EDUCATION TRUST
REGISTERED CHARITY NO: 1102239

SAFEGUARDING ADULTS AT RISK

POLICY AND PROCEDURES

Policy Name: Safeguarding Adults at Risk Policy and Procedures

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Safeguarding concern immediate action

- Make safe. If anyone is in immediate danger, seriously injured, needs urgent medical help or a crime is in progress, call 999.

- Listen and reassure. Take the concern seriously. Do not promise secrecy, investigate, confront the alleged source of risk, or ask leading questions.

- Preserve evidence. Do not delete messages, wash clothing, tidy a location, or copy potentially illegal material. Follow Police or safeguarding-lead advice.

- Report immediately. Contact the Head of Safeguarding or another designated safeguarding lead and record the concern on CPOMS or the approved form.

- Use the alternative route. If the safeguarding lead is unavailable, implicated or delay would increase risk, contact the local authority adult safeguarding service and/or Police directly.

- Record facts. Include dates, times, locations, people present, the adult's own words, immediate action, consent and capacity issues, information shared and decisions made.

- Follow up. The safeguarding lead records the decision, referral, rationale, outcome, and support offered. If appropriate action is not taken, escalate through the Board Senior Safeguarding Lead, whistleblowing route, or relevant external agency.

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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 those 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

The Club has comprehensive safeguarding policies and procedures in place to protect adults at risk and promote their welfare. These policies and procedures are designed to meet relevant legislation and statutory guidance, including the Care Act 2014, the Mental Capacity Act 2005 and its Code of Practice, the Equality Act 2010 and other relevant legislation and statutory guidance.

This policy applies across the Club and must be observed by all those working with or supporting adults at risk. The application of this policy and its procedures, and the promotion of good safeguarding practice, is mandatory. All requirements of this policy are obligatory and must be followed where there are any suspected instances of abuse, neglect, exploitation, or poor practice involving an adult at risk.

All staff, volunteers and partners working with or on behalf of the Club must make themselves aware of the Club's Adults at Risk Safeguarding Policy and Procedures. Where appropriate to their role, they will be supported through the Club's safeguarding training programme and must undertake any relevant training required for their role.

The person with responsibility for safeguarding adults at risk at the Club is the Head of Safeguarding (HoS). The Club acknowledges and accepts its responsibility for the safety and wellbeing of adults at risk who engage in activities conducted by or on behalf of the Club.

The Club takes a person-centred approach, with the welfare, safety, dignity, and wellbeing of adults at risk being of paramount importance. The Club recognises the importance of supporting adults to make their own decisions and choices wherever possible and will take account of their wishes and feelings when responding to safeguarding concerns.

It is the responsibility of all staff working at the Club to safeguard the welfare of adults at risk by creating an environment in which they are treated with dignity and respect and are protected from harm.

For the purposes of this policy, an adult at risk is an adult who has needs for care and support, whether or not the local authority is meeting any of those needs, is experiencing, or is at risk of, abuse or neglect, and as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

This policy applies directly to the Club and its activities and sets out the safeguarding expectations and arrangements for organisations that have a formal relationship with the Club, including:

- **Watford FC (the Club)** – directly governed by this policy.
- **Watford FC Academy (the Academy)** – where activities involve adults at risk, directly governed by this policy.
- **Watford Women FC (WWFC)** – operated by an independent franchise partner under agreement with the Club, with the continued use of the Club's name and badge. The franchise partner is responsible for the day-to-day operation of the team and its safeguarding arrangements. The Club maintains appropriate safeguarding assurance and oversight through the relationship and will work together with our partners where safeguarding concerns involving adults at risk arise.

- **Watford FC Community Sports and Education Trust (the Trust)** – an independent charitable organisation with its own governance and operational arrangements. The Club maintains a strategic relationship with the Trust, including appropriate safeguarding assurance, oversight, and collaboration. The Trust remains responsible for the day-to-day management and delivery of its activities and for ensuring that its own staff, volunteers, and programmes meet the required safeguarding standards.

  The Club will maintain appropriate communication and information-sharing arrangements with the Trust and the franchise partner to ensure that safeguarding concerns involving adults at risk are identified, reported, and escalated appropriately.

  Nothing within this policy removes or replaces the safeguarding responsibilities of the Trust or their partners within their own organisations.

Safeguarding Standards and External Agencies

These procedures ensure that appropriate national standards for safeguarding adults at risk are met and implemented throughout the Club. The Club operates in accordance with relevant legislation and statutory guidance relating to the safeguarding of adults at risk.

The Club recognises that adults at risk may be subject to different forms of abuse and neglect. This may include physical abuse, sexual abuse, emotional or psychological abuse, financial or material abuse, discriminatory abuse, organisational or institutional abuse, neglect and acts of omission, self-neglect, domestic abuse, modern slavery, and exploitation.

The Club recognises that concerns may arise in relation to the actions of another individual, including a member of staff, volunteer, partner, carer, family member, or other person who has contact with an adult at risk. Concerns may also arise where an adult at risk is not receiving appropriate care or support or where poor practice places an adult at risk of harm.

Where there are concerns that an adult at risk may be experiencing, or may be at risk of, abuse or neglect, the Club will seek appropriate advice and, where necessary, make a referral to the appropriate local authority safeguarding adults service and/or the Police, as appropriate.

The Club will work with the relevant local authority, safeguarding adults board, Police, health services, care providers, and other relevant organisations where there are safeguarding concerns involving an adult at risk. The Club will provide appropriate information and support to ensure that concerns are managed appropriately and without delay.

The Club will have regard to the principles of the Mental Capacity Act 2005 when concerns involve an adult's ability to make a particular decision. The Club will support individuals to make their own decisions wherever possible and will not assume that an individual lacks capacity because they make a decision that others may consider to be unwise.

Where there are concerns that an adult may lack capacity to make a particular decision, the Club will ensure that the appropriate procedures are followed and that any action taken is in accordance with the Mental Capacity Act 2005 and relevant safeguarding requirements.

The Club recognises that consent and confidentiality are important considerations when responding to safeguarding concerns involving adults at risk. Wherever appropriate, the Club will seek the adult's consent before sharing information or making a referral. However, there may be circumstances where information needs to be shared without consent, including where this is necessary to protect the adult or others from harm or where there is another lawful basis for doing so.

The Club will refer allegations or concerns about an adult who works or volunteers with adults at risk to the relevant external agency where the criteria for involvement are met. This may include the relevant local authority safeguarding adults service, the Police, a regulatory body, professional body, or other appropriate organisation.

Where concerns relate to the suitability of an individual to work with or support adults at risk, the Club will take appropriate action in accordance with its safeguarding procedures and any relevant legal, regulatory or employment requirements.

The Club will maintain appropriate working relationships and regular communication with local safeguarding partners, statutory agencies, and other relevant organisations. Where there are concerns that an adult at risk may be at risk of harm, the Club will make a referral to the appropriate safeguarding adults service and/or the Police, as appropriate.

All referrals and external agency involvement will be managed in accordance with the Club's safeguarding procedures and relevant information-sharing requirements.

All staff, volunteers and partners have a responsibility to recognise and report safeguarding concerns involving adults at risk and must follow the Club's safeguarding procedures where a concern is identified.

4 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 fulfil 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.
- **HORIZONS**: 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

5 Safeguarding Governance and Leadership

Safeguarding Executive Group (SEG)

The Safeguarding Executive Group (SEG) provides strategic oversight and accountability across the Club and the Trust. It is jointly chaired by the Club's Board Senior Safeguarding Lead and Legal Director and includes the Trust's nominated representatives, currently the Trust Senior Safeguarding Lead and Community Director.

The SEG provides strategic oversight, assurance and challenge across the participating organisations. Each organisation remains responsible for its own governance, operations and legal duties. The SEG reports through arrangements approved by the Club Board and the Trust Board of Trustees

Strategic Safeguarding Group (SSG)

The Club has a Strategic Safeguarding Group (SSG), led by the Club's Senior Safeguarding Lead at Board level, which provides strategic direction, leadership, and oversight of safeguarding across the Club. The SSG considers safeguarding performance, risks, emerging issues, and areas for improvement, ensuring safeguarding remains embedded within the Club's governance arrangements and is appropriately reported and escalated to the Board.

Operational safeguarding is led by the Head of Safeguarding, supported by the wider safeguarding and welfare team. The SSG and operational safeguarding team work together to ensure effective implementation of the Club's safeguarding strategy, policies, and procedures, with appropriate assurance, challenge, and continuous improvement.

Safeguarding Management Group (SMG)

The Club's Safeguarding Management Group (SMG) supports the effective implementation of safeguarding across all areas of the Club and ensures that safeguarding remains a key priority within its day-to-day operations. The Group has a collective responsibility to support the Strategic Safeguarding Group (SSG) and provide safeguarding leadership and support across Club departments.

The SMG brings together a range of expertise and experience from across the Club to promote effective safeguarding, welfare, and wellbeing, and to support a strong safeguarding culture.

The SMG works collaboratively with the SSG and wider safeguarding team to support the delivery of the Club's safeguarding strategy, policies, and procedures. The Group also supports effective communication across the Club, identifies safeguarding issues, and risks, and ensures that concerns are appropriately escalated through the Club's safeguarding governance arrangements.

6 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 (including abuse and exploitation) and, because of their care and support needs, is unable to protect themselves.

Definition of Club

The Club means Watford Football Club Limited, including its employees, workers, volunteers, Academy, and activities operated directly by it.

The Trust means Watford FC Community Sports and Education Trust, an independent charitable organisation responsible for its own governance, operations, and safeguarding arrangements.

WWFC means Watford Women FC, operated by the independent franchise partner responsible for its day-to-day operations and safeguarding arrangements.

Where this policy is intended to apply to more than one of these organisations, it uses the term 'participating organisations' and identifies the organisations concerned. Nothing in this policy transfers one organisation's legal or operational responsibilities to another.

Definition of Safeguarding Team

The collective term for those who hold specific roles within safeguarding for the Club. These roles include, but are not exclusive to, Senior Safeguarding Leads, Head of Safeguarding, Safeguarding Leads, Safeguarding Managers, and Designated Safeguarding Officers.

Definition of Staff

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

Definition of Partners

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

Definition of Activity or Activities

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.

Definition of Safeguarding Adults at Risk

Safeguarding adults at risk means protecting an adult's right to live in safety, free from abuse and neglect. It involves working with adults, wherever possible, to understand their wishes, views and desired outcomes and taking appropriate action to prevent or stop abuse, neglect or exploitation while promoting their wellbeing, dignity, choice and independence.

The Key Principles Underpinning this Policy are:

- The welfare of the adult at risk is paramount – Care Act 2014.
- 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 the Club.

8 Person Focus

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

The Club will apply the six adult safeguarding principles: empowerment, prevention, proportionality, protection, partnership and accountability.

The adult's views, wishes, feelings, beliefs and desired outcomes will inform the response wherever possible. The Club will not assume that an adult lacks capacity because of disability, diagnosis, appearance, behaviour or an apparently unwise decision.

Responses will be proportionate to the circumstances and use the least restrictive option that is consistent with the need to prevent or reduce harm. Information will be shared lawfully, fairly, securely and only to the extent necessary for safeguarding purposes.

- **Staff and partners must recognise, respond to, record and report concerns in accordance with this policy. Empowerment and choice** – Adult at Risk's are supported to make their own decisions wherever possible. Consent, autonomy, and control are respected at all times.
- **Voice of the adult**: Adults at risk are listened to, believed, and involved in discussions and decisions about their care and protection.
- **Respect for rights** - Upholds the rights of adults under the Human Rights Act 1998, Care Act 2014, and Mental Capacity Act 2005.
- **Prevention-focused** - Proactive steps are taken to identify and reduce risks early before harm occurs.
- **Individual needs recognised**: Each adult at risk is viewed as a unique individual with their own history, preferences, culture, and support needs.
- **Partnership working**: Organisations work together with adults and other agencies to provide coordinated, effective support.
- **Least restrictive practice**: Responses to risk are proportionate, respecting the adult's freedom, dignity, and independence as much as possible.
- **Inclusive and anti-discriminatory**: Adults are supported in a way that is free from discrimination, considering age, disability, gender identity, sexual orientation, race, religion, or belief.
- **Safe and respectful environments**: Environments are designed to make adults feel safe, valued, and heard, promoting dignity at all times.
- **Safeguarding is everyone's responsibility** - All staff and partners understand their duty to prevent, recognise, report, and respond to abuse or neglect.

Why a Person-Centred, Adult-First Culture Matters

Embeds the six safeguarding principles from the Care Act 2014:

1. **Empowerment**
2. **Prevention**
3. **Proportionality**
4. **Protection**
5. **Partnership**
6. **Accountability**

These principles should be applied in a way that recognises the individual circumstances, wishes and needs of each adult at risk. Safeguarding should support people to remain as independent as possible while ensuring that appropriate action is taken where there are concerns about abuse, neglect, or harm.

9 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 working relationships with the Club Board, Strategic Safeguarding Group, EFL Safeguarding Team, Designated Safeguarding Officers, Police, the local Safeguarding Adults Board, the local authority adult safeguarding service, the DBS and The FA Safeguarding Team. Where a concern also involves a child, follow the Club's child safeguarding procedure and consult the Local Authority Designated Officer where required.
- Work closely with the Club Board and Strategic Safeguarding Group to review the safeguarding strategy and respond to changes in legislation, statutory guidance, EFL rules and FA rules.
- Lead the Club's response to safeguarding concerns and cooperate with relevant agencies, including the Police, the local authority adult safeguarding service and Prevent or Channel services.
- Oversee safeguarding and welfare across the Club, including the Men's First Team, Academy, Player Care and Wellbeing teams, while maintaining appropriate safeguarding links with Watford Women FC and the Trust.

Safeguarding and Welfare Lead (SWL)

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

- Assist and support the Head of Safeguarding (HoS) in the delivery of effective safeguarding and welfare arrangements across the Club and in maintaining high standards of safeguarding practice.
- Act as deputy to the Head of Safeguarding in their absence and support the HoS in the management of safeguarding matters as required.
- Provide safeguarding expertise, advice, and guidance within the areas of the Club for which the role has responsibility, including supporting staff awareness, training, and the effective implementation of safeguarding procedures.
- Work closely with the HoS and wider safeguarding team to promote, embed, implement, and continually improve the Club's safeguarding provision.
- Provide safeguarding support to the Player Care Lead, working collaboratively to ensure that safeguarding and welfare considerations are appropriately identified, managed, and escalated.

  Support appropriate communication and information sharing with Club departments and, where necessary, the Trust and Watford Women FC. The Trust and Watford Women FC remain responsible for their own day-to-day safeguarding arrangements.

Welfare and Development Manager (WDM)

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

- Act as a link between safeguarding, welfare, and Club management, working closely with coaches, medical, performance and other relevant teams.
- Manage people and welfare initiatives, including apprenticeships, intern support, and general workforce operations.
- Promote wellbeing and safeguarding across the Club, supporting welfare initiatives and acting as a first point of contact for welfare concerns, with safeguarding concerns escalated to the appropriate safeguarding lead.
- Support staff development and compliance across the Club, including onboarding, training plans, performance reviews, and relevant regulatory training.
- Provide day-to-day operational support to the Head of Safeguarding and wider safeguarding team, helping to ensure that safeguarding and welfare priorities are effectively implemented across relevant areas of the Club.

Player Care Lead (PCL)

The role of the Club's Player Care Lead is to:

- Support the welfare and wellbeing of Academy and Men's First Team players. Arrange suitable support, training or guidance for players, staff and, where relevant, family members or carers.
- Work closely with the Safeguarding and Welfare Lead and relevant Club departments to coordinate effective player care and welfare arrangements and ensure that the individual needs of players are identified, supported, and appropriately managed.
- Maintain safe ways for players, coaches, staff and, where relevant, family members or carers to raise welfare and safeguarding concerns.
- Identify and report safeguarding concerns under this policy and work with the Head of Safeguarding and Safeguarding Team as required.

Safeguarding Lead (Trust) (SLT)

The role of the Safeguarding Lead (Trust) (SLT) 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)

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.
- Be available at reasonable times as a first point of contact for adults at risk, staff, partners and, where appropriate, external agencies.
- Ensure that concerns, allegations and poor practice are reported promptly and recorded securely on CPOMS in line with data protection requirements.
- Attend Designated Safeguarding Officer meetings, complete agreed actions and maintain relevant professional development.

10 Safer Recruitment

Disclosure and Barring Service (DBS) and Safer Recruitment Policy

The Club assesses every role in identifying the lawful level of pre-employment checking. A role that involves regulated activity with adults is subject to:

- an Enhanced DBS check with the Adults' Barred List where the role is legally eligible, together with two suitable references; and
- completion of all required pre-employment checks before the person starts regulated activity. Any risk-managed exception must be lawful, documented and approved by HR and the Head of Safeguarding.

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Ongoing DBS Requirements

- Staff and partners in eligible roles must complete repeat DBS checks in line with the Club's safer recruitment procedure, normally every three years or earlier where a risk or rule requires it.
- Staff must also complete an annual self-declaration if they are undertaking regulated activity or regulated work with adults at risk.

Overseas Applicants

- All elements of the Club's safer recruitment process and pre-appointment checks apply equally to applicants from overseas.
- Additional overseas checks will be conducted on any applicant who has lived or worked outside of the UK in the last three years and spent more than three months abroad.
- These checks are in addition to the standard DBS process.

Disclosure of Criminal Convictions

- Applicants must disclose information that the Club is legally entitled to ask for and that is not protected by the DBS filtering rules.
- For roles covered only by the Rehabilitation of Offenders Act 1974, applicants are not required to disclose spent convictions.
- For an eligible role, the Club may ask an exempted question and request the appropriate DBS check. Protected cautions and convictions must not be requested or taken into account.
- Current DBS filtering guidance is available at www.gov.uk/government/publications/dbs-filtering-guidance.www.gov.uk/government/publications/new-guidance-on-the-rehabilitation-of-offenders-act-1974

Legal Framework

The Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012 provide the legal framework for regulated activity and barred-list checks. The Club must use the current DBS eligibility guidance when deciding the level of check.

The recruiting manager and HR must assess the duties of the role against current DBS eligibility guidance. An Enhanced DBS check, with an Adults' Barred List check where eligible, must be completed before the person undertakes regulated activity unless a lawful, documented risk-management arrangement has been approved.

Positive Disclosures and Risk Assessment

If a DBS check reveals any convictions or other relevant information:

- The Club will assess whether the nature of the offence(s) renders the individual unsuitable for working with adults at risk.
- A risk assessment will be conducted to review the contents of the disclosure certificate.
- The individual may be invited to an interview before a final recruitment decision is made.
- Where appropriate, the Head of Safeguarding, HR Manager, English Football League, The FA, and/or the Adult Care Services Manager may participate in the risk assessment meeting.

Online and Social Media Screening

As part of the shortlisting and due diligence process, the Club may carry out online searches for publicly available information relevant to an applicant's suitability for the role.

11 Staff Induction and Training

All staff must complete the Club's safeguarding induction and training on the Club's safeguarding recording system, CPOMS.

Staff must complete the safeguarding, Prevent and ACT training specified for their role and refresh it at the intervals set out in the Club's training matrix.

People with designated safeguarding responsibilities must complete role-appropriate advanced safeguarding training and refresh it as required by the Club's training matrix. Any additional mental health first-aid requirement must match the needs of the role.

HR and Learning and Development will keep training records. Recruiting managers must complete safer recruitment training appropriate to their responsibilities.

Managers should discuss relevant safeguarding practice during regular performance and development reviews. Designated Safeguarding Officers will receive suitable supervision and professional development

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/

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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 must use their authority responsibly, manage risk and protect adults at risk from discrimination and avoidable harm. They must understand this policy and the duties relevant to their role.

Staff and partners meet their duty of care by building respectful, professional relationships and taking reasonable steps to prevent foreseeable harm.

Staff and partners must demonstrate integrity, maturity and good judgement whilst working with adults at risk. Any person who has responsibility for an adult at risk in connection with a Club activity, whether acting alone or jointly with others, occupies a position of trust and must behave in accordance with this policy, the relevant code of conduct and the boundaries of their role.

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. Mental Capacity

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Mental Capacity

Mental capacity is decision-specific and time-specific. An adult must be presumed to have capacity unless it is established, on the balance of probabilities, that they lack capacity to make the particular decision at the time it needs to be made. All practicable steps must first be taken to support the adult to make the decision.

The person responsible for making or carrying out the particular decision is normally responsible for deciding whether the adult has capacity for that decision. This may be a member of staff for an ordinary day-to-day decision. Complex disputed or high-risk decisions may require advice or assessment from an appropriately qualified professional.

Club staff must not make clinical diagnoses or attempt complex capacity assessments outside their competence. If capacity may affect a safeguarding response, staff must record the concern and seek prompt advice from the Head of Safeguarding and, where appropriate, the relevant health, social-care or legal professional.

A person is not to be treated as lacking capacity merely because they decide that others consider unwise. If a person lacks capacity, any act or decision on their behalf must be in their best interests and be the least restrictive effective option.

Definition of Mental Capacity

Mental capacity is the ability to make a decision at a particular time. The starting assumption must always be that a person has the capacity to make their own decisions, unless it can be clearly established that they lack capacity.

A person lacks capacity if they are unable to make a specific decision or take a particular action for themselves at the time when that decision or action needs to be taken. It is important to recognise that someone may lack capacity in one area but still be able to make decisions in others.

For example, an individual may be able to make everyday decisions such as what to wear or eat but may lack capacity to make more complex decisions, such as managing their finances.

A person who lacks capacity at a certain time may regain the ability to make that decision later, for example, following recovery from illness or injury.

The person responsible for the decision will normally assess capacity for that decision. A suitably qualified professional should be involved when the issue is complex, disputed or outside the person's competence.

Report any welfare or safeguarding concern promptly to the Head of Safeguarding or another member of the Safeguarding Team.

Factors to Consider When Dealing with a Person Who May Have Mental Health Issues or Lack Capacity:

- Does the person have a general understanding of the decision they need to make, and why it is necessary?
- Do they understand the likely consequences of making, or not making, that decision?
- Can the person understand, retain, use, and weigh the information relevant to the decision?
- Can the person communicate their decision (by any means, including verbal, non-verbal, or other communication methods)?

15 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 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.

16 Procedures for Gaining Consent

The adult should be involved in safeguarding decisions, and their informed consent should be sought before information is shared or a referral is made, wherever it is safe and appropriate to do so.

Consent is not the only lawful basis for sharing information. Information may be shared without consent where this is necessary and proportionate, including where there is an immediate or serious risk to the adult or another person; a crime may have been committed; the alleged source of risk has access to other adults or children; staff are being implicated; there is a legal, regulatory or contractual duty to share; the adult may be under coercion or undue influence; or the adult lacks capacity for the relevant decision and sharing is in their best interests.

If the adult refuses consent, the decision must be respected unless there is a sufficient lawful and safeguarding reason to override it. The Head of Safeguarding must record the adult's wishes, the risks considered, the lawful basis, why sharing was or was not necessary and proportionate, what was shared, with whom and the outcome.

Family members, carers, advocates, and representatives must not automatically receive information. Their authority, involvement, the adult's wishes, any risk they may present and the minimum information necessary must be considered before disclosure.

A lack of consent must never delay contact with emergency services where there is an immediate risk to life or serious harm.

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17 Information Sharing

When a safeguarding concern arises, staff must share relevant information promptly with the Head of Safeguarding or another designated safeguarding lead. The safeguarding lead will decide whether information needs to be shared with the local authority adult safeguarding service, Police, health services, a regulator, a governing body, or another relevant organisation.

Information sharing must be lawful, fair, necessary, proportionate, relevant, accurate, timely and secure. Only the information needed for the safeguarding purpose should be shared, and the decision and rationale must be recorded.

Where it is safe and appropriate, the adult should be told what information will be shared, with whom and why. The adult should not be informed in advance if doing so could increase risk, prejudice an investigation, place another person at risk, or otherwise undermine the safeguarding response.

If a member of staff is uncertain, they must seek advice from the Head of Safeguarding or Data Protection Lead. Uncertainty about the data protection position must not be used as a reason for inaction where a person may be at risk of serious harm.

18 Protecting Adults at Risk with Disabilities

Disabled adults can face additional barriers to recognising, reporting or escaping abuse, neglect and exploitation. Disability does not make a person at risk. Consider the person's circumstances, communication needs, reliance on others, access to information and support, social isolation and environmental barriers. Do not dismiss a possible sign of abuse as part of a disability or illness.

- 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.

19 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.
- Record relevant health, communication, accessibility and support needs with the adult's involvement and consent and ensure that staff who need the information know how to respond safely.
- Personal or intimate care must be planned with the adult, respect their dignity, preferences, and consent, and be delivered only by appropriately trained and authorised people in accordance with the relevant care plan and risk assessment. Do not assume that a same-gender worker is always required; ask the adult about their preference and consider safety, privacy, and availability.
- Medication must be managed only by authorised and competent people in accordance.
- Involve a carer, advocate or authorised representative only where appropriate, taking account of the adult's wishes, capacity, confidentiality, and any risk posed by that person.
- 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

Contractors and organisations whose work may bring their staff into contact with adults at risk or children must meet the requirements in the Club's Procurement and Contractors Safeguarding Agreement and the safeguarding policy relevant to the people they work with.

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 Enhanced 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.

21 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, procedures, and relevant working documents.
- Know who the Head of Safeguarding and Safeguarding Team members are, and how to contact them.
- Put the welfare of the adult at risk first and act in their best interests.
- Ensure the safety and wellbeing of individuals or groups in their care.
- Record any concerns or allegations relating to adult at risk welfare via the Club's CPOMS reporting system, as outlined in this policy.
- Maintain confidentiality around sensitive information, sharing only on a need-to-know basis.
- Promote an open and supportive environment where staff and individuals feel safe to raise concerns, confident that appropriate action will be taken.
- Adhere to the Club's Codes of Conduct and Ethics.
- Encourage and consistently demonstrate high standards of behaviour.
- Where manual or physical support is required, ensure it is provided openly and with the adult at risk's consent.
- Physical contact must only occur when appropriate and must never be intrusive or disturbing. Consent must always be obtained.
- Obtain written consent from parents or guardians if Club officials are required to transport adults at risk.
- Obtain written consent from the person responsible for any significant travel arrangements (e.g. overnight stays).
- Ensure a qualified first aider is in attendance at all activities.
- At away events, staff must not enter an adult at risk's room or invite them into their own 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 allowing permission for the administration of emergency first aid or medical treatment if required.
- Keep a written record of any injury that occurs, including details of any treatment given. Submit all records via CPOMS.
- Follow the Club's Lone Working Policy, Lone Worker Risk Assessment, and Late Collection and Missing Person Procedures.
- If supervision in changing rooms is required, coaches and staff must always work in pairs.

22 Poor Practice & Abuse When Working with Adults at Risk

Poor practice occurs whenever staff fail to uphold the highest standards of care and support in their professional conduct. When left unchallenged, poor practice can cause harm and may escalate into abuse. It is unacceptable and will be treated seriously, with appropriate action taken.

Please refer to the Club's Disciplinary Policy, Grievance Procedure, Whistleblowing Procedure, and Harassment and Bullying Policy for further guidance.

An individual may not always be aware that poor practice or abuse is taking place, as they may perceive the behaviour to be 'acceptable.' The following behaviours are regarded as examples of poor practice and may be considered high-risk safeguarding concerns. They must be avoided at all times:

Examples of Poor Practice:

- Unnecessarily spending excessive amounts of time alone with an adult at risk, away from others.
- Being alone with an adult at risk in changing rooms, toilet facilities, or showers.
- Taking an adult at risk alone in a car on any journey, regardless of the distance.
- Sharing a room with an adult at risk.
- Engaging in rough, physical, or sexually provocative behaviour, including horseplay.
- Allowing or engaging in inappropriate touching of any kind.
- Failing to challenge adults at risk using inappropriate or offensive language.
- Making sexually suggestive comments to an adult at risk — even as a joke.
- Using humiliation or emotional distress (e.g. reducing an individual to tears) as a form of control.
- Allowing any disclosure or allegation made by an adult at risk to go unchallenged, unrecorded, or unaddressed.
- Doing things of a personal nature for an adult at risk that they are capable of doing for themselves.
- Engaging with an adult at risk on social media for personal reasons — refer to the Club's Social Media Policy.
- Communicating with an adult at risk via electronic means unless it is strictly for business purposes and through approved platforms. If in doubt… don't do it.

Challenging Poor Practice

It is essential to challenge poor practice at all times. This includes behaviours such as:

- Racism
- Sexism
- Homophobia
- Bullying
- Foul, aggressive, or provocative language

- Any form of controlling behaviour that may upset or harm a child

Never ignore bullying or verbal abuse from supporters, parents/carers, coaches, or other adults, always:

- Listen to and support the individual being targeted
- Explain to the person displaying the behaviour that it is unacceptable
- Take appropriate action and report concerns
- Refer to the Club's Harassment and Bullying Policy, where relevant

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 adults 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.
- People disclose fully or partially that sexual abuse is occurring or has occurred in the past.
- People exhibit significant changes 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:

Do not investigate the concern. In a non-emergency, ask what the adult wants to happen and record their wishes. Explain that information may still need to be shared to protect them or another person.

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.

Keep disruption to the adult to a minimum. If it is safe and lawful, move the alleged source of risk rather than the adult. If that is not possible, help the adult reach a safe place and seek urgent advice.

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.

Where this policy requires an external safeguarding referral, staff must refer to the relevant local authority adult safeguarding service using the current referral route for the area in which the adult is located or the concern arose. If the correct authority is uncertain, the Head of Safeguarding must seek advice without delaying urgent protective action.

Call 999 where there is an immediate danger, a serious injury, a crime in progress or urgent medical assistance is required. Use 101, the relevant Police safeguarding route or the local authority adult safeguarding service for non-emergency concerns, as appropriate.

27 Allegations Against an Adult

Managing Safeguarding Concerns and Allegations Against Adults

The Club takes every concern or allegation about a person who works or volunteers with adults at risk seriously. The safety, wishes, rights, and wellbeing of the adult will guide the response, subject to the need to protect other people.

Report the concern immediately to the Head of Safeguarding or another designated safeguarding lead. If that person is implicated, use the alternative route in this policy and contact the relevant external agency where necessary.

- Do not investigate, confront the person who is the subject of the allegation or promise confidentiality. Record the facts and preserve evidence.
- The Head of Safeguarding will consider immediate safety, employment or volunteering measures, the adult's views, information-sharing duties, and referrals to external agencies.
- Where the concern relates to a person in a position of trust, the Club will follow the relevant local Safeguarding Adults Board framework and consult the local authority adult safeguarding service where the criteria are met.
- The Club will contact the Police if a crime may have been committed and will refer to The DBS, a regulator, governing body, or professional body where the relevant legal or regulatory criteria are met.
- The Club will cooperate with external agencies and share necessary, proportionate information in line with safeguarding and data protection requirements.

Any decision to suspend, redeploy or restrict duties is a neutral risk-management measure and is not a finding of guilt. HR and safeguarding leads will review the measure as information changes.

The person who is the subject of the concern must be treated fairly and told about available support, subject to any restriction requested by the Police or another investigating agency.

The Club will keep a clear record of the concern, decisions, reasons, referrals, action taken and outcome.

The Club will consider whether the concern identifies a risk to other adults or children. If a child may be at risk, the child safeguarding procedure must also be followed.

If the concern involves Trust or Watford Women FC personnel, the employing organisation must follow its own procedure. The organisations will share relevant information and coordinate action where the concern crosses organisational boundaries.

Safeguarding action takes priority over disciplinary, grievance, complaints, and whistleblowing processes where delay or parallel action could create risk or prejudice an external investigation.

Reasonable adjustments must be offered to any person who needs them during the process.

28

PREVENT – Radicalisation and Extremism

Prevent – Radicalisation and Extremism

The Club recognises the safeguarding risks associated with radicalisation and extremism and will support any adult who may be susceptible to being drawn into terrorism or extremist activity.

Radicalisation is the process by which a person comes to legitimise support for, or use of, terrorist violence. There is no single profile, set of characteristics or pathway to radicalisation. A person's susceptibility may be influenced by a range of factors, including exposure to radicalising influences, personal circumstances, grievances, social isolation, or other vulnerabilities.

Extremism, as defined by the Government in 2024, is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to negate or destroy the fundamental rights and freedoms of others; undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve these aims.

The Prevent duty forms part of the Government's CONTEST counter-terrorism strategy and is established through the Counterterrorism and Security Act 2015. The statutory Prevent duty applies to specified authorities set out in legislation. While the Club is not itself a specified authority under the statutory duty, the Club recognises the value of the Prevent framework and will follow relevant Prevent guidance as part of its safeguarding arrangements.

The Club recognises that Adults may be susceptible to radicalisation through online activity, social media, peer groups, personal relationships, exploitation, isolation, grievance, or exposure to extremist material. Staff should remain alert to information or behaviour that creates a safeguarding concern while avoiding assumptions based on lawful religion, political opinion, culture, dress, disability, mental health or social isolation.

Concerns about an adult should be reported through the Club's safeguarding route. The Head of Safeguarding will consider immediate risk, the adult's wishes, and capacity, whether a crime or risk to others is involved, and whether advice or referral to Police, the local Prevent team, Channel or another service is appropriate.

Where a concern also involves a child, the Club's child safeguarding policy and procedures must be followed in parallel.

There is no definitive list of signs that indicate radicalisation. Changes in behaviour, appearance, interests, friendships, or online activity may have many explanations and should not, on their own, be treated as evidence of radicalisation or extremism. Staff should consider the wider circumstances of the individual and report concerns where behaviour, activity or information causes a safeguarding concern.

Staff are not expected to identify extremist symbols, tattoos, websites, or material themselves. Where something gives rise to concern, they should report it to the Head of Safeguarding or an appropriate member of the Club's Safeguarding Team, who will seek further advice where necessary.

The Club follows a Notice, Check, Share approach:

- **Notice:** Be alert to behaviour, information or circumstances that raise a safeguarding concern, including concerns relating to radicalisation or extremism.
- **Check:** Consider the concern and seek advice from the Club's Safeguarding Team where appropriate.
- **Share:** Report the concern promptly to the Head of Safeguarding or an appropriate member of the Safeguarding Team in accordance with the Club's safeguarding procedures.

Concerns relating to radicalisation should be managed in the same way as other safeguarding concerns. Examples may include significant changes in behaviour, concerning online activity, exposure to extremist material, expressions of support for terrorism or terrorist organisations, threats or encouragement of violence, or behaviour suggesting that an individual is being groomed, exploited, or influenced by others.

Concerns relating to discriminatory or hateful behaviour, including racist, religiously motivated, homophobic, transphobic, or other forms of abuse, should also be reported in accordance with the Club's safeguarding procedures. Such behaviour should not automatically be treated as evidence of extremism or radicalisation but may require safeguarding action.

The Club recognises the importance of respecting individuals' lawful religious beliefs, political views, cultural identity, and freedom of expression. Religious observance, changes in dress or appearance, political views or personal beliefs should not, in themselves, be considered indicators of radicalisation or extremism.

Where appropriate, the Head of Safeguarding will seek advice from the relevant local Prevent team and consider whether a Prevent referral is required. Where an individual is assessed as being susceptible to radicalisation, they may be considered for support through the Channel programme or other appropriate safeguarding interventions.

Involuntary Celibates (Incels)

Incel-Related Extremism and Misogynistic Extremism

The Club recognises the potential safeguarding risks associated with online communities and ideologies that promote extreme misogyny, hatred, violence or the dehumanisation of women and others. This includes concerns relating to Incel (involuntary celibate) extremism, which is recognised within the Government's Prevent framework as a category of concern.

The term "incel" is used by an online movement predominantly associated with men who identify as involuntarily unable to form romantic or sexual relationships. While identifying with the term does not, in itself, indicate a safeguarding concern or involvement in extremism, some online communities associated with incel ideology promote extreme misogyny, hatred towards women, glorification of violence and, in some cases, support for terrorist violence or other serious criminal behaviour.

Adults may encounter extremist content through social media, gaming platforms, online forums, and other digital environments. Staff should remain alert to online grooming, exploitation, or pressure towards extremist or violent ideologies.

Staff should not attempt to diagnose or label an individual as an "incel" or make assumptions based on social isolation, relationship difficulties, appearance, interests, or personal views.

Concerns should be considered in the context of the individual's wider behaviour and circumstances.

Staff should report concerns where there are indicators such as:

- expressions of extreme hatred, hostility or violence towards women or girls;
- glorification, encouragement, or justification of violence;
- support for terrorist or extremist ideologies or organisations;
- repeated engagement with extremist or violent online material;
- threats of violence or statements suggesting an intention to harm themselves or others;
- evidence that an individual is being manipulated, groomed, or influenced by others towards extremist activity; or
- significant changes in behaviour or online activity which, when considered alongside other concerns, give rise to a safeguarding concern.

Take particular care where a person may be more susceptible because of isolation, exploitation, coercion, peer influence, or other circumstances. One indicator does not prove radicalisation. Record the facts and seek advice from the Safeguarding Team.

Where concerns are identified, staff should follow the Club's **Notice, Check, Share** approach.

The Head of Safeguarding will consider whether further safeguarding action or a referral to the relevant external agency is required. Where there are concerns that an individual may be susceptible to radicalisation, the Club may seek advice from the local Prevent team and consider making a Prevent referral. Prevent referrals are safeguarding referrals intended to provide early support to individuals who may be susceptible to radicalisation.

Staff can also seek confidential advice through the ACT Early Support Line on **0800 011 3764**, which is available 24 hours a day. Club staff should normally use the Club's safeguarding reporting arrangements in the first instance, with the Safeguarding Team obtaining specialist Prevent advice where required.

The Club will promote respectful relationships, equality, positive online behaviour and challenge attitudes or behaviours that promote misogyny, hatred, or violence. Safeguarding concerns relating to misogyny, discrimination, abuse, or violence will be managed in accordance with the Club's wider safeguarding procedures.

29 Non-Recent Concerns of Abuse

The Club recognises that concerns relating to historical or non-recent abuse must be taken seriously. Any disclosure or concern relating to abuse that may have occurred in the past should be reported promptly to the Head of Safeguarding or an appropriate member of the Club's Safeguarding Team.

Concerns relating to recent or non-recent abuse within football may also be reported directly to The FA Safeguarding Team at safeguarding@thefa.com. The FA has a dedicated football safeguarding helpline for adults who have experienced sexual abuse in childhood: **0800 023 2642**. Current opening hours should be checked via The FA's safeguarding website.

Take all allegations and disclosures seriously, however long ago the abuse may have happened and whether the alleged source of risk or the person affected is deceased. Share information with the Police, local authority adult safeguarding service, The FA, or another relevant agency where this is necessary and lawful. If a child may also be at risk, follow the child safeguarding procedure in parallel.

Non-recent information may identify a current risk, support an investigation, reveal a pattern, or help a person obtain support. Do not dismiss it because of the time that has passed.

Record and manage the concern under this policy. Consider the person's views and wishes, while recognising that information may need to be shared to protect them or another person.

Where appropriate, individuals affected by historical or non-recent abuse will be provided with information about available support. This may include the NSPCC, NAPAC, Victim Support, the Professional Footballers' Association (PFA), The FA's football safeguarding support services, and other specialist organisations.

Where there is an immediate risk of harm, the Police or emergency services should be contacted without delay.

30 Adult-on-Adult Abuse

Adult-on-adult abuse includes physical, sexual, psychological, financial or discriminatory abuse, domestic abuse, coercive control and exploitation between adults in intimate, family, friendship, peer or other relationships.

It may include serious bullying, cyberbullying, domestic abuse, sexual exploitation, harmful sexual behaviour, harassment and prejudice-based violence.

Online abuse may include harassment, threats, coercion, grooming, non-consensual sharing of intimate images or other sexualised content, and exploitation through digital platforms.

31 County Lines

County lines activity can exploit adults at risk to transport drugs, money or weapons. Gangs may take over a person's home through coercion or force; this is often called cuckooing. Possible indicators include:

- many visitors to a person's home, including people from outside the 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

Use of Images and Photography

The Club will use photographs, video and audio involving adults at risk lawfully, fairly, and respectfully. Before recording or publishing, the Club will identify the purpose and lawful basis, provide clear privacy information, and obtain consent where consent is the appropriate lawful basis.

An adult's capacity to agree to a particular recording or use must be considered only where there is a reason to doubt it, and all practicable support must be provided. A relative, carer or supporter cannot consent on behalf of an adult unless they have relevant legal authority or the decision is lawfully made in the adult's best interests.

The Club will take particular care where an image could reveal health, disability, location, accommodation, support needs, or other information that could create a safeguarding risk. The adult's wishes and dignity must be considered even where another lawful basis is available.

Only authorised people may record for Club purposes. Club-approved equipment, accounts, storage, and publication channels must be used. Images and recordings must be relevant, appropriate, securely stored, accessible only to authorised people, retained only as required and disposed of securely.

Photography and recording are prohibited in changing rooms, showers, toilets, treatment areas, and any other place where a person reasonably expects privacy, except where recording is specifically authorised for a lawful safeguarding or evidential purpose.

Any concern about inappropriate recording, possession, use, or sharing must be reported immediately through the Club's safeguarding procedure. Where the material may be evidence of a crime, staff must preserve it and seek advice; they must not copy, forward or delete it unless instructed by an authorised agency.

The Club will ensure that:

- adults are dressed appropriately for the activity and intended publication;
- images focus on the activity where possible and do not identify an adult unnecessarily;
- images are respectful, appropriate and do not place an adult at risk of harm, embarrassment, or exploitation;
- personal information accompanying images is kept to the minimum necessary and appropriate;
- an adult who is subject to a court order, legal restriction or safeguarding plan is not identified where publication is prohibited or would create a risk;
- images and recordings are stored securely and only accessed by authorised persons;
- images and recordings are retained and disposed of in accordance with the Club's data protection and retention requirements; and
- images must not be taken, stored, or shared on personal devices, including personal mobile phones, tablets, or personal cloud storage.

Club photographers and approved third parties must display appropriate Club identification when undertaking photography or filming on behalf of the Club and must comply with all Club safeguarding and photography requirements.

Recordings made for legitimate Club purposes, including coaching, analysis, player development, match or event recording and safeguarding purposes, must be undertaken using Club-approved equipment and systems and stored securely.

33 E-Safety

The Club's online safety guidance protects adults at risk who use phones, games consoles, online services or other technology as part of a Club activity. Staff must follow the same professional boundaries online as they do in person.

The online safety guidance is available on the Club intranet. Staff must also follow the Club's data protection, communications and social media policies.

Illegal or Harmful Online Content

If staff encounter suspected child sexual abuse material or other illegal content, they must not view it unnecessarily, copy it, forward it or delete it. They must preserve the device or account state, report immediately to the Head of Safeguarding and follow Police or National Crime Agency advice. Any concern involving a child must also be managed under the Club's child safeguarding policy.

34 Social Networking Guidance

Social Media and Electronic Communication

Social media and electronic communication can support Club activities but can also create safeguarding, privacy, and professional-boundary risks.

Adults working with or on behalf of the Club must:

- not add, follow, accept, or otherwise connect with adults at risk for whom they have responsibility on personal social media accounts;
- not use personal social media accounts to communicate privately with adults at risk for whom they have responsibility;
- avoid one-to-one electronic communication with adults at risk wherever possible. Where communication is necessary, it should be through an approved Club channel and, where appropriate, include the carer or other responsible adult;
- use only Club-approved communication methods and accounts when communicating with adult at risk in relation to Club activities; and
- report any inappropriate or concerning online communication involving an adult at risk in accordance with the Club's safeguarding procedures.
- The Club's Social Media Policy provides further guidance on the appropriate use of social media and electronic communication and should be read alongside this policy.
- These requirements apply regardless of the social media platform or method of electronic communication used.

35 Communication Guidance

The following guidance is provided to support and manage safeguarding responsibilities effectively. It aims to ensure that adults at risk and those in a position of trust are not subjected to improper communications, exploitation, or false allegations.

- Explain how the Club will communicate and obtain an adult's agreement where consent is required. If there is reason to doubt capacity for that decision, provide support and follow the Mental Capacity Act. A representative may decide only where they have legal authority, or a lawful best-interests decision is made.
- Use a Club-approved platform for all work-related communication. Do not use personal social media accounts or unapproved messaging services.
- Staff or partners must not use personal devices or accounts to communicate with adults at risk. This includes sharing any personal contact information.
- Do not send texts or emails for personal conversation, or to share pictures, jokes, or other items of a personal nature.
- Where communication is necessary, it should be professional, relevant, and related to specific organisational activities, such as changes to arrangements, schedules, or event details.
- Use group messages or include another relevant staff member where appropriate. If one-to-one contact is necessary, keep it professional, use an approved channel and retain the record.
- Never share or request personal information, including contact details, social media profiles, or home addresses.
- Report any inappropriate communication received from an adult at risk, their representative, or family member to the Safeguarding Team. The Head of Safeguarding or a designated team member will decide on the appropriate action.
- Do not delete any messages, images, or data received through communication with an adult at risk. These may be needed for safeguarding purposes.
- If you receive any non-organisation-related communications or messages that raise concern, inform the Head of Safeguarding or a team member immediately and await guidance before responding.

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

Provide supervision that is proportionate to the activity and each adult's needs, wishes and abilities. A written risk assessment must consider:

- the competence and experience of staff and partners;
- the nature, location and duration of the activity; and
- known risks, communication needs and any agreed support arrangements.
- The activity lead must record and review the supervision arrangements with the Club before the activity begins.
- Use any relevant guidance from the sport's governing body or statutory agencies, but do not rely on a fixed ratio where individual needs require a different arrangement.

38 Confidentiality

Staff and partners may receive confidential information to carry out their role. They must use it only for a legitimate work purpose and must not use it for their own or another person's advantage.

Information must never be used to intimidate, humiliate, or embarrass the individual.

Share personal information only with people who need it for a legitimate purpose. Use anonymised information where identity is not necessary.

A safeguarding concern may require information to be shared with the Safeguarding Team or an external agency. Share without delay when this is necessary to protect the adult or another person, and record what was shared, with whom and why.

If unsure, seek prompt advice from the Head of Safeguarding or another designated lead. Do not let uncertainty delay emergency action or a necessary external referral. Send media enquiries to the Club's communications team and legal enquiries to the appropriate legal contact.

Personal information must be handled in line with UK GDPR, the Data Protection Act 2018 and the Club's data handling policies. Staff, workers, consultants, agency staff and volunteers must:

- treat information about an adult at risk as private and secure; and
- seek safeguarding or data protection advice when unsure whether information should be shared.

39 Matchday Requirements

The Club may refuse or manage admission where a specific, evidence-based risk cannot be reduced to an acceptable level. Decisions must not be based on disability or an assumption about capacity and must comply with equality law.

A person who needs support to attend may require a Personal Emergency Evacuation Plan. The plan must explain evacuation arrangements and any agreed assistance.

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 the person's agreed emergency contact where this is necessary and appropriate; and
- provide reasonable, safe support while the person is at the stadium, in line with the risk assessment and the Club's role.
- If an adult appears lost, distressed or at risk, stay with them where safe, alert the Matchday Safeguarding Lead or Head of Operations and follow the safeguarding procedure. Do not assume that an unaccompanied disabled adult lacks capacity or needs a carer.
- 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 11.** Strategic Safeguarding Group (SSG)
Appendix 2. What to Do if You Receive a Safeguarding Disclosure		**Appendix 12.** Safeguarding Management Group (SMG)
Appendix 3. How to Report a Safeguarding Concern		**Appendix 13.** Men's First Team Designated Safeguarding Officers (DSO)
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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 may include persistent tiredness, frequent unexplained absence, social isolation, being regularly left without support, stealing or having no money, or a carer or responsible person repeatedly failing to attend or provide support.
Sexual Abuse	Physical signs such as genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush, anal pain in 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 or 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 may include difficulty forming relationships, anxiety about attending activities, withdrawal, anger, mood changes, self-harm or suicide attempts, reduced participation, missing money or possessions, or distress after receiving messages or emails
Emotional Abuse	Physical signs may include weight change, unexplained speech difficulties, self-harm or clothing that is inappropriate for the weather, activity or person's needs.	Behavioural signs may include fear of mistakes, withdrawal, anxiety about speaking to others, unexplained communication changes or social isolation
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/ with 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

Respond to the disclosure as it happens. Make sure the adult's immediate needs are met and help them feel supported. Do not investigate. Take the disclosure seriously even if you are unsure whether it is accurate. Your role is to listen, make the situation safe, report and record.

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 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 adult is safe and supported, tell the Head of Safeguarding or another member of the Safeguarding Team immediately. Contact a statutory agency directly if there is immediate danger, delay would increase risk, the safeguarding leads cannot be reached, or a safeguarding lead is implicated. Share information only with people who need it to protect the adult or another person.

Stage 3

Report and record the concern as soon as possible. Use CPOMS or the Club's online reporting form. Record what you saw and heard while it is fresh in your memory.

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?

The Head of Safeguarding or Safeguarding Team should confirm that the concern has been received and explain any action you need to take. They may be unable to share confidential details. If you receive no acknowledgement, follow up and escalate if you remain concerned.

If you believe the concern has not been handled appropriately, escalate it to the Board Senior Safeguarding Lead, use the confidential reporting procedure or contact the relevant external agency.

A disclosure is not the only reason to report. You may notice signs, witness an incident or receive information from someone else.

Anonymous information and partial information must still be recorded and reported. Do not wait for proof.

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

The Club will assess every concern and take proportionate action. This may include a referral to the Police, local authority adult safeguarding service, DBS, EFL, Premier League, The FA or another relevant body. The Head of Safeguarding will report significant external referrals through the Club's governance arrangements.

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

Report safeguarding concerns through CPOMS or the Club's online reporting form. If there is immediate danger, call 999 before making the internal report.

Stage 2

If you cannot use the normal route, or a member of the Safeguarding Team is implicated, contact the Head of Safeguarding or another designated lead directly.

Stage 3

If the concern remains unresolved, is very serious or involves the Head of Safeguarding, contact the Board Senior Safeguarding Lead, use the Club's confidential reporting procedure or contact the relevant external agency. Use the current contact details in Appendix 8.

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 poof 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 social care services.

RESPECT

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

RECORD

- You should also make sure you make 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:

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**

Is there an immediate risk to the or Adult at Risk and/or are they in need of urgent medical treatment?

No

Yes

- **Contact emergency services by calling 999.**
- **Inform the carer, unless doing so would put the adult, yourself, or others at risk.**
- **Contact your Safeguarding Manager or member of the Safeguarding Team immediately.**

Are you a casual member of staff?

Yes

No

- **Report your concern within 8 hours by scanning the QR code below or visit www.watfordfc.com/supporters/safeguarding**
- **Refer to the WFC Yellow Safeguarding Card**

- **Report your concern directly on CPOMS**
- **Use the QR code if you cannot access CPOMS**
- **All concerns MUST then be uploaded to CPOMS within 8 hours.**

The Safeguarding team will deal with the case from here – but may contact you if they need further information or need you to take an action.

The Safeguarding team will deal with the case from here – but may contact you if they need further information or need you to take an action.

Appendix 4. Dealing With Concerns in a Football Setting

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

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

Is there an immediate risk to the individual and/or are they in need of urgent medical treatment?

No

Report your concern within 8hrs by using CPOMS account or scanning the QR code on the front cover of this document.

Club Safeguarding Team will:

- Follow Club procedure.
- Seek advice from statutory/partners.

Where appropriate statutory agencies/ partners give advice to HoS:

- Give advice for the Safeguarding Team to action.
- Monitor the behaviour of the individual or Club as required.
- Gather additional evidence.

Where deemed appropriate, the PL or EFL Lead Designated Officer will contact the relevant authority, and further action may be taken.

If referred to the FA Safeguarding Team, the case will be considered by The FA Safeguarding Review Panel. The possible outcomes include:

- Advice and/or warning as to future conduct.
- Independent assessment.
- Further support or training.
- Supervision and/or monitoring.
- Suspension.
- No case to answer.

All appeals regarding The FAs decisions will be dealt with by The FA appeals procedures which can be found in The FA Handbook, available on www.TheFA.com

Yes

Contact emergency services:

- 999 Police and/or Ambulance.
- Safeguarding Team

If you telephone for an ambulance or take the adult at risk to hospital. You need to inform the parents you are doing this.
* Inform the doctor of your concerns in relation to protection issues (the doctor will take the appropriate action). Inform HoS of the action you have taken, and they will inform the FA Safeguarding Team.

I am not sure.

Does the abuse involve the Club's? Head of Safeguarding?

Yes

Contact the Club's HR Manager, Legal Director or Senior Safeguarding Lead immediately and follow their guidance.

No

Contact the Safeguard Team immediately and follow their guidance.

HoS or Safeguarding Team will inform as necessary either:

- Adult Board/Adult Social Care.
- Police.
- FA Safeguarding Team.

If unable to contact designated PL or EFL Lead Designated Officer, contact:

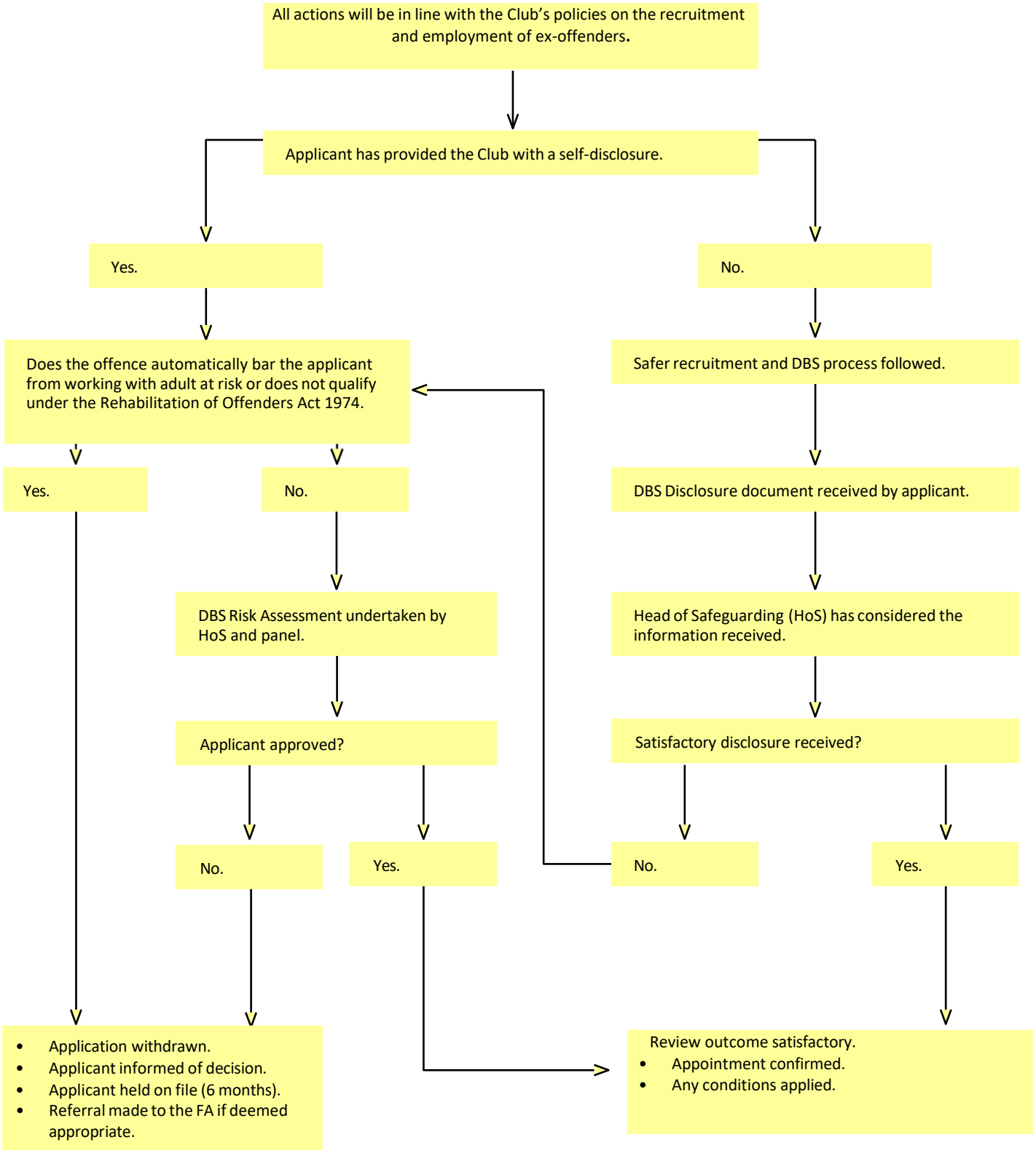
- Adult Board/Adult Social Care.
- Police.
- NSPCC 24-hour Helpline.
- FA Safeguarding Team.

Possible Outcomes:

- Referral to Local Authority Designated Officer (LADO).
- Police enquiry.
- Criminal proceedings.
- Civil proceedings.

If in doubt, contact Head of Safeguarding
*If the parents are allegedly involved in the abuse, only inform them that you are taking the adult at risk to hospital. Do not share any other information.

Appendix 5. DBS Assessment Procedure



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 - GOV.UK (www.gov.uk)

Appendix 6. Managing Allegations Against an Adult

A safeguarding allegation is raised concerning the conduct or behaviour of a staff member or partner.

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Is the concern about the Head of Safeguarding?

Yes	**No**
Inform the Club's HR Manager, Legal Director, or Senior Safeguarding Lead immediately. The person raising the concern must complete an Incident Report Form within 8 hours and submit it to the HR Manager, Legal Director, or Senior Safeguarding	**Inform the Head of Safeguarding immediately.** The person raising the concern must complete a CPOMS report or submit an online referral within 8 hours.

↓

Initial Evaluation:
The Head of Safeguarding (or the HR Manager if the allegation involves the Safeguarding Team) determines whether the staff member or partner:

- Behaved in a way that has harmed or may harm a child.
- Possibly committed a criminal offence against a child.
- Acted in a way that suggests they are unsuitable to work with children.

A referral will be completed, and the incident recorded in CPOMS by the Head of Safeguarding, a Safeguarding Team member, or the HR Manager.

↓

External Notification and Risk Management:

- The Head of Safeguarding will contact the Local Authority Designated Officer (LADO) and/or the police for advice and support.
- The FA's Professional Game Safeguarding Team will also be informed along with English Football League (EFL) Safeguarding Lead via online reporting portal.
- Based on advice from the LADO or police, the Club will decide whether to

↓

Internal Investigation and Outcome:
Once statutory investigations are complete—or in parallel where appropriate—the Club will:

- Conduct an internal investigation.
- Decide on any sanctions to be taken against the staff member or partner.
- If the staff member or partner is removed from their role, referrals will be made to the Disclosure and Barring Service (DBS), the FA's Professional Game Safeguarding Team and EFL Safeguarding Team.

Please Note - The reporting process set out above applies to Club staff and representatives. Trust and Watford Women's FC staff should follow their own organisation's safeguarding and allegations procedures.

Appendix 7. Internet Grooming and Online Exploitation

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

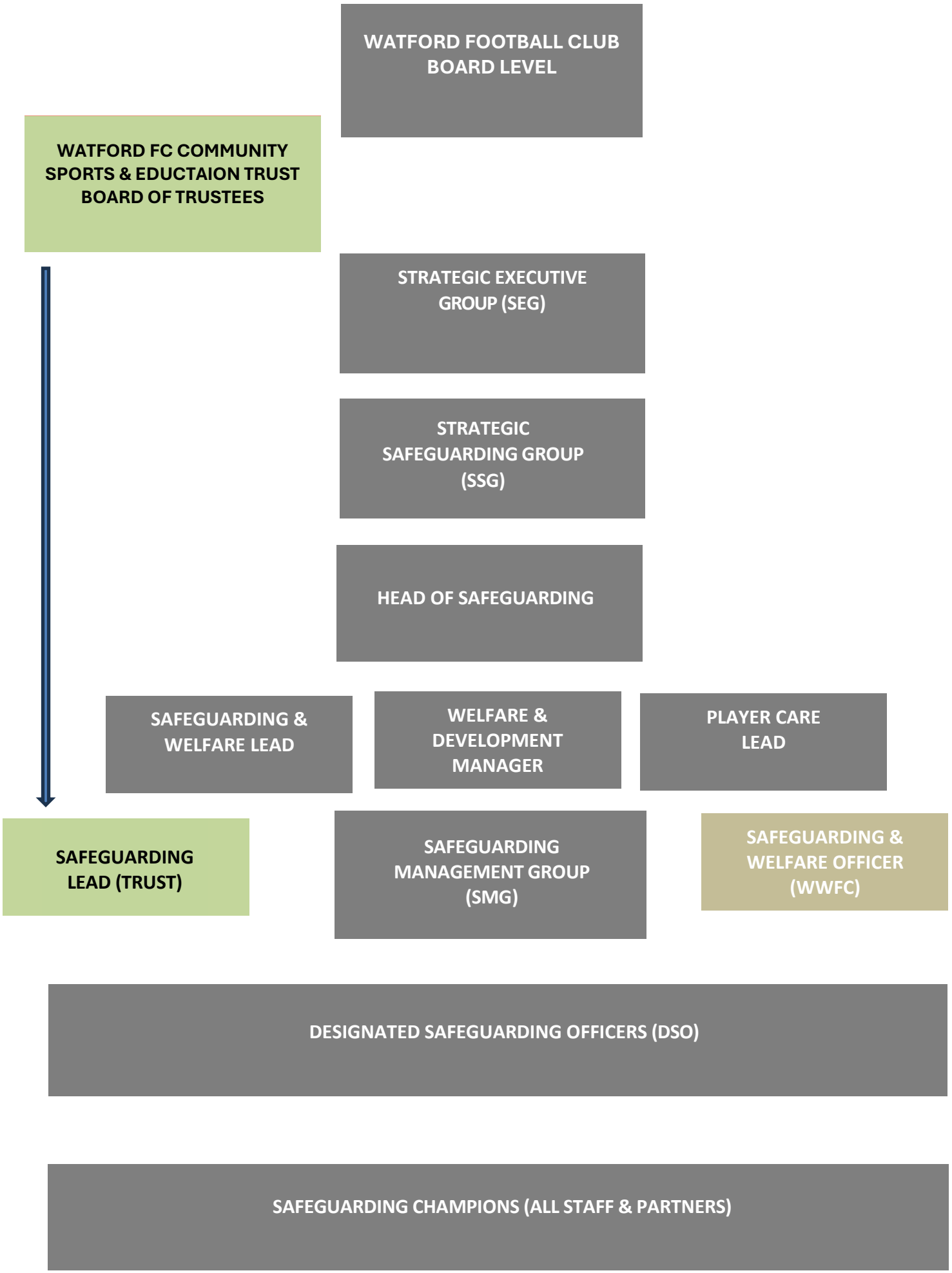
What might a friend see?

- 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 8. Safeguarding Structure



Appendix 9. Key Safeguarding Contacts

Head of Safeguarding (HOS)
01923 496256 // 07855 300439

Head of Operations (HoO)
07707 289044

Senior Deputy Head of Safety and Security (SDHoSS)
07514 658482

Safeguarding and Welfare Lead (SWL)
07718 124522

Welfare and Development Lead (WDL)
07784 228546

Player Care Lead (PCL)
07964 082163

Safeguarding Lead (Trust) (SLT)
07761 207888

WWFC Safeguarding & Welfare Officer (S&WO)
07938 482590

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 6677

Appendix 10. Safeguarding Executive Group (SEG)

Safeguarding Executive Group (SEG) Members

Professor Stuart Timperley
Non-Executive Director & Senior Safeguarding Lead

Rosemary Inskipp
Trustee & Senior Safeguarding Lead

Iain Taker
Legal Director
iain.taker@watfordfc.com

Rob Smith
Community Director
rob.smith@watfordfctrust.com

Appendix 11. Strategic Safeguarding Group (SSG)

Safeguarding Board Leads

Scott Duxbury
Chairman & CEO

Professor Stuart Timperley
Non-Executive Director
& Senior Safeguarding Lead

David Fransen
Non-Executive Director

Strategic Safeguarding Group (SSG) Members

Rob Clarke
Head of Safeguarding
rob.clarke@watfordfc.com

Professor Stuart Timperley
Non-Executive Director & Senior Safeguarding Lead

Iain Taker
Legal Director
iain.taker@watfordfc.com

Ian Pope
Operations & Facilities Director
ian.pope@watfordfc.com

Richard Johnson
Academy Director
richard.johnson@watfordfc.com

Appendix 12. Safeguarding Management Group (SMG)

Safeguarding Lead

Rob Clarke
Head of Safeguarding
rob.clarke@watfordfc.com

Safeguarding Management Group (SMG) Members

Rob Clarke
Head of Safeguarding
rob.clarke@watfordfc.com

Leah Crocket
Safeguarding & Welfare Lead
leah.crocket@watfordfc.com

Anne-Marie Burn
Welfare & Development Manager
annemarie.burn@watfordfc.com

TBA
Player Care Lead
TBA@watfordfc.com

Alison Chadwick
Senior Deputy Head of Safety & Security
alison.chadwick@watfordfc.com

Jessica Doran
Safeguarding & Welfare Officer (WWFC)
jessica.doran@watfordfc.com

Clare Deacon
Safeguarding Lead (Trust)
clare.deacon@watfordfctrust.com

Kristian Hitchins
Head of Business Services (Trust)
kristian.hitchins@watfordfctrust.com

Appendix 13. Men's First Team Designated Safeguarding Officers

Safeguarding Lead

TBA
Player Care Lead
TBA@watfordfc.com

Designated Safeguarding Officers (DSO)

Gianmarco Ceresa
Team Manager
gianmarco.ceresa@watfordfc.com

Adam Payne
Junior Sport Scientist
adam.payne@watfordfc.com

Dr. Nishal Shah
First Team Doctor
nishal.shah@watfordfc.com

TBA
Player Care Lead
TBA@watfordfc.com

Jon Marks
Head of Football Administration
jon.marks@watfordfc.com

Appendix 14. Academy Designated Safeguarding Officers

Safeguarding Lead

Leah Crocket
Safeguarding & Welfare Lead
leah.crockett@watfordfc.com

Designated Safeguarding Officers (DSO)

Leah Crocket
Safeguarding & Welfare Lead
leah.crocket@watfordfc.com

TBA
Player Care Lead
TBA@watfordfc.com

Ryan Jackett
Academy PDP Coach
ryan.jackett@watfordfc.com

Adam Balletta
Asst. Head of Coaching Lead FP/YDP
adam.balletta@watfordfc.com

James Banathy
Academy FP/YDP Coach
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Rebecca Tidmarsh
Academy PDP Physio (U18)
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Chrissy Murray
Academy Therapist
chrissy.murray@watfordfc.com

Rebecca McDermott
Academy Operations Manager
rebecca.mcdermott@watfordfc.com

Appendix 15. Club's Designated Safeguarding Officers (DSO)

Safeguarding Lead

Richard Green
Head of Operations
rick.green@watfordfc.com

Designated Safeguarding Officers (DSO)

Richard Green
Head of Operations
rick.green@watfordfc.com

Ian Pope
Operations & Facilities Director
ian.pope@watfordfc.com

Alison Chadwick
Senior Deputy Head of Safety & Security
alison.chadwick@watfordfc.com

Paul Dhanjal
Deputy Head of Safety & Security
paul.dhanjal@watfordfc.com

Carol Robinson
Operations & Facilities Administrator
carol.robinson@watfordfc.com

Appendix 16. Watford Women Designated Safeguarding Officers

Safeguarding Lead

Jessica Doran
Safeguarding & Welfare Officer
jessica.doran@watfordfc.com

Designated Safeguarding Officers (DSO)

Jessica Doran
Safeguarding & Welfare Officer
jessica.doran@watfordfc.com

Helen Ward
Head of Women's Football
helen.ward@watfordfc.com

Renee Hector
Women's Head Coach
renee.hector@watfordfc.com

Appendix 17. Trust Designated Safeguarding Officers

Safeguarding Lead

Clare Deacon
Safeguarding Lead (Trust)
clare.deacon@watfordfctrust.com

Designated Safeguarding Officers (DSO)

Luke Beaumont
Schools Sports Projects Officer
luke.beaumont@watfordfctrust.com

Elliot Bird
Schools Sports Projects Officer
elliot.bird@watfordfctrust.com

Luke Denis Le Seve
Health & Wellbeing Officer
luke.denisleseve@watfordfctrust.com

Madeline Hurley
EDI Officer
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Laura Figg
Higher Education – Strategic Lead
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Tasha Hiscock
Community Centre Manager
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Nathan Masters
Player Development Manager
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Matthew Nelson
Compliance and Risk Officer
matthew.nelson@watfordfctrust.com

Paul Palmer
Business Support Officer
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Ines Perreira
Youth & Health Wellbeing Officer
ines.perreria@watfordfctrust.com

Lucy Tearle
Community Projects Manager (Young People)
lucy.tearle@watfordfctrust.com

Appendix 18. 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
- UK 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 19. 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