

ADULTS AT RISK POLICY

SAFEGUARDING & WELFARE

Steve Swinyard | V5.0 – 08/04/19



Key Policy Terminology and Definitions:

Adult(s) at Risk – An adult is a person aged 18 or over, has need for care and support (whether or not those needs are being met) and is experiencing, or is at risk of, abuse or neglect and as a result of those needs is unable to protect him or herself against the abuse.

The Academy – The club’s external independent site at which the nurturing, developing and administration of the club’s young players takes place.

The Charity - Refers to Newcastle United Foundation (NUF), its workforce and all activities it undertakes. In certain circumstances it may also refer to third parties with an entrusted responsibility for delivering club-supported activity.

The Club – Refers to Newcastle United Football Company Limited, Newcastle United Football Club, St James’ Park, its workforce and all activities undertaken by the organisations or at these premises. In certain circumstances it may also refer to third parties with an entrusted responsibility for delivering club-supported activity.

The FA – Refers to the Football Association, the National Governing Body for Football in England.

Harm – The ill-treatment of an individual or impairment of their Welfare due to acts of Abuse or inappropriate behaviour including witnessing 3rd party abuse or inappropriate behaviour.

Local Authority – Refers collectively or individually when named to the district, borough, city and county councils that are responsible for governance of the county of Northumberland in which the Club/Charity operates. Specifically, but not exclusively, these include Newcastle City Council, Gateshead Metropolitan Borough Council, North Tyneside Metropolitan Borough Council and Northumberland County Council.

Local Authority Safeguarding Board – Refers to the department within each Local Authority responsible for providing guidance, training and governance on all Safeguarding matters within their area of governance.

The NSPCC – Refers to the National Society for the Prevention of Cruelty to Children (NSPCC), a charity that actively campaigns for and works within child protection in England, Wales, Northern Ireland and the Channel Islands

The Premier League – Refers to the organisation responsible for governance and administration of English Football’s highest ranked league, of which Newcastle United FC are current members



afeguarding – Preventative and reactional measures taken by the Club/Charity to ensure; the risk of harm or mistreatment of vulnerable groups is minimised; the health or wellbeing of vulnerable groups is not impaired whilst engaging in Club or Charity related activities; an environment exists that supports the best possible outcomes or life chances for vulnerable groups.

Safeguarding Team – The collective group of staff within the Club and Charity that have a professional responsibility for the Safeguarding of Vulnerable Groups. Specifically, this is made up of The Safeguarding Board, Safeguarding Officers, Partner Safeguarding Officers and Additional Verifiers.

Staff – Refers to persons employed by and receiving payment for services from the Club or Charity. This is irrespective of the length or nature of their contract.

The Training Ground – The club's external independent site at which the day to day training and administration of the Club's First team & Under 21 team takes place.

Volunteers – Persons who freely offer their skills and expertise or take part in a task, event or enterprise with the club or charity at their own expense in terms of time and/or resources.

Vulnerable Group(s) – The collective term used when talking about or referring to Children, Young People and Vulnerable Adults as a whole.

Welfare – The health, happiness and fortunes of individuals and the humanitarian aspects of their life including personal needs, social interactions & physical or psychological development.

Workforce – Refers to the combined entity created when staff, volunteers and/or third party contractors are deployed together to work on a Club or Charity activity, event or enterprise.



Key Policy Personnel:

The primary owners of this policy are the Safeguarding & Welfare department of the Club.

However other key personnel are identified as follows:

Head of Safeguarding & Welfare

The Head of Safeguarding, Welfare and Equality oversees the Safeguarding Team and is ultimately responsible for maintaining the safety and wellbeing of all children, young people and adults at risk when engaged in activities with the Club and Charity, including on match days. Day to day, the role of the Head of Safeguarding, Welfare and Equality is to strategically manage the Club's overall Safeguarding provision and includes the writing, implementing and updating all Safeguarding policies, procedures, best practices, the training and development of staff (in terms of Safeguarding) and the handling of all allegations or escalated reports of poor practice. On Match Days, the Head of Safeguarding, Welfare and Equality will oversee the handling of reported incidents within the stadium footprint that compromise the safety and wellbeing of any child, young person or adult at risk.

The Head of Safeguarding, Welfare and Equality is also the Club/Charity's Disclosure and Barring Service (DBS) Master Disclosure Manager and, in conjunction with the Safeguarding Board, takes a lead role in the process of criminal record checking of staff and the hiring of ex-offenders. The Head of Safeguarding, Welfare and Equality also actively seeks to work closely with Local Authorities, the Premier League and the FA to embed a vulnerable group safeguarding culture within the Club/Charity.

Safeguarding, Welfare & Equality Lead Officers:

Integral to the day to day functioning of the Safeguarding and Welfare Department are the Safeguarding and Lead persons. Reporting directly to the Head of Safeguarding and Welfare and the Head of Inclusion, their role is manage the implementation of the safeguarding strategy at a departmental level and act as the first point of contact for safeguarding and welfare concerns, incidents and complaints. Safeguarding, Welfare and Equality Lead persons are often the hands-on driving force for safeguarding and welfare within each department and have responsibilities to support the embedding best practice within their relevant department(s). They also manage the safer recruitment and criminal records checks for all staff in their department working in regulated activity or activities involving children.



Safeguarding, Welfare & Equality Officers:

In addition to the Safeguarding, Welfare & Equality Lead Officers, the Club also employs a number of Safeguarding Officers to work across various departments of the Club/Charity. Typically, Safeguarding and Welfare Officers work to support the Safeguarding, Welfare & Equality Lead Officers within each department and support the safeguarding of children and adults at risk across the organisation.

Meeting regularly, they also assist the Safeguarding, Welfare & Equality Lead Officers with record keeping, case/incident handling and policy/practice review where appropriate and the processing of criminal records checks (including verification).

Additional Verifiers:

Additional Verifiers are appointed within each of the 3 departments of the Club/Charity (Club, Academy and Foundation) to support the Safeguarding team with the processing of workforce Criminal Records Checks (CRC) as part of the club's effective 'Safer Recruitment'.

Please note: Anybody with a concern about an adult at risk's welfare can contact any of the Safeguarding team for advice or guidance with queries they may have.

* It is acknowledged that whilst Newcastle United Foundation is considered an independent organisation various support services are administered for it in kind by Newcastle United FC ('The Club'). This means all policies, procedures and guidance are adopted by Newcastle United Foundation.



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Adults at Risk Policy

Introduction

The Club/Charity is committed to creating opportunities for adults with disabilities and mental health needs to participate in a broad spectrum of activities at the Club at the same time as creating a safer culture for the participants. The participation of adults at risk may be as players, coaches, employees, volunteers, officials, administrators or spectators.

The Club has a moral, legal and social responsibility to provide a fun and safe environment for all those participating in these activities and a commitment to manage and monitor allegations of discrimination, harassment and abuse.

Where appropriate, the following policy will be supplemented by in-service training and additional guidance or policies.

Rules, Regulations and Guidance

The Club/Charity is governed by the rules and regulations set out by several key governing agencies including the Football Association and Premier League amongst others.

The definition of an adult at risk is always open to interpretation and individuals may be vulnerable at some times and not others. The content of this policy is underpinned by relevant legislative documents and policies as presented by these key governing agencies.

Key documents underpinning this policy include:

- 'Safeguarding Vulnerable Groups Act' (2006) - HM Government
- 'Mental Capacity Act' (2005) – HM Government
- 'DBS Barred list' (2012) – HM Government
- 'Sexual Offences Act' (2003) – HM Government
- 'Care Act' (2014) – Department of Health
- 'Human Rights Act' (1998) – HM Government
- 'Premier League Rules; Section S' – The Premier League
- 'Guide for Safer Working Practice' – The Premier League
- 'Working together to Safeguard Football - Policy & Procedures' – The Football Association



The Club/Charity is fully committed to ensuring that the best practice recommended by these legislations, policies and guidelines is implemented, maintained and embedded within the day to day working practice of all staff at all times. The Club/Charity is also fully committed to a 'continually improving' approach to Safeguarding.

In keeping with these commitments, the Club/Charity recognises its responsibility to maintain regular dialogue with the Newcastle Safeguarding Adults Board as its primary Local Authority partner as well as the local Safeguarding boards of the Northumberland, North Tyneside, Gateshead, Durham and Teesside districts in keeping with the presence of

Club/Charity activities within these regions. Specifically, the relationship of the Club/Charity and these Local Authorities is centred upon supporting the club with; reporting/monitoring of Safeguarding incidents, sharing of best practice, sharing information/changes in legislation, sharing of important local area information, workforce best practice, training and development plus any other relevant appropriate Safeguarding support.

Scope

This policy is written for adults at risk of harm who engage with the Club/Charity in any capacity. For the purposes of this policies it is acknowledged that such risk of harm could be by virtue of physical and mental disabilities, learning difficulties or a temporary state of behaviour that results from a particular set of circumstances which makes the adult involved temporarily vulnerable to harm (e.g. alcohol intoxication). In addition the Club/Charity recognises that adults have a right to self-determination so may not wish to have others intervene to safeguard them and that an adult at risk may be vulnerable at some times but not others depending on circumstances, environment and events. This Adults at Risk Policy supports the Club to react to occasions where proactive and preventative work with adults at risk of harm may have failed and/or where vulnerability to or actual harm has occurred. This may be by acts of commission or omission, as defined by statutory guidance, legislation and the law and where an adult at risk has not been able to safeguard his or her self.

It also recognises that adults may consent to the activities they undertake (inclusive of sexual activities) and the issue of consent may affect the reporting and management of allegations. Local Authorities are often organised differently in how they receive and manage referrals and commonly operate with different thresholds for handling referrals. This policy recognises that there is not a uniform approach by the various Local Safeguarding Boards to referrals and will act to provide overarching guidance to the Club when handling sensitive information or safeguarding concerns.

A particular focus of the Club is to ensure that effective safeguards are put in place to support keeping adults at risk safe and to prevent harm occurring or re-occurring, either to the same adult at risk or to other adults at risk in identified situations.



As part of this, this policy will be reviewed annually to reflect changes in legislation or best practice or following any identified learning outcomes from safeguarding incidents, concerns or allegations or regional and national serious case reviews.

Aims & Key Principles

Whilst it is hoped that proactive preventative work, including training, vetting and providing clear support policies and best practice guidelines are sufficient to safeguard all adults, the Club/Charity recognises that it has a responsibility to embed a proactive approach into all aspects of its daily working practice.

The key aims of this policy are therefore:

- To outline how the Club/Charity will safeguard the welfare of adults at risk at the Club and protect them from any significant harm or abuse.
- To demonstrate best practice in the area of safeguarding adults at risk.
- To outline how the Club/Charity will report any concerns about abuse or harm to adults at risk to the appropriate authorities whether this occurs within the Club or elsewhere and whether this be a potential criminal offence or other concern. The appropriate authorities may be internal and external to football.
- To outline how the Club/Charity will ensure appropriate investigations and responses to concerns about abuse or harm are carried out within the Club.
- To promote action following any investigation of such kind and to support the implementation of appropriate safeguards to protect adults at risk in the future and to reduce the risk of harm to other adults at risk in the Club.

The key principles underpinning this policy are:

- All adults at risk, regardless of gender, age, disability, sexual orientation, race or religion have the right to equal protection from abuse or harm
- Adults at risk will be respected, valued and listened to at all times
- All allegations of abuse will be taken seriously and responded to appropriately, efficiently and effectively.
- To encourage parents and other members of an adult at risk's family to also be involved in a relationship with The Club/Charity.
- To ensure that coaches, parents and other adults who come into contact with adults at risk provide good role models of behaviour.



Who we aim to protect

Whilst the key principles of this policy primarily centre upon Safeguarding adults at risk who engage with the Club/Charity, it is important to recognise this policy will in reality also act to protect wider groups of people in the Club/Charity's care.

For clarity, in keeping with definitions outlined in the Care Act (2014), the Club/Charity defines an adult at risk is someone who is aged 18 or over and:

- Has needs for care and support (whether or not the authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect
- As a result of their needs is unable to protect himself or herself against the abuse or neglect or risk of it.

Included in these wider groups of people in the Club/Charity's care are:

Participants:

- Adults at risk who are employed by the Club/Charity in any capacity
- Adults at risk who are taking part in activities organised by the Club/Charity
- Adults at risk who are attending First Team, U21 and Academy team matches as spectators
- Adults at risk who are visiting the Stadium and/or Academy and/or Training Ground for events/tours

The workforce:

Whilst each allegation of abuse or neglect will be taken seriously, support will be available to anyone who may be subject to false allegations of abuse or neglect Permanent, temporary, fixed term, contract and/or voluntary staff

- Charity delivery staff (Administration staff, coaches, tutors and managers)
- Coaches and Managers (Academy, U21 and First Team)
- Medical staff
- Education, Administration and Analysis staff
- Players (Seniors)
- Scouts and external Football staff
- Academy Host Families,
- Nine & Terrace bar staff and their Licence holders
- Hospitality and event staff



- Security Staff and Stewards
- Staff employed by external partners including Sports Direct (applicable only to staff employed by outlets trading on Club/Charity premises), Sodexo, G4S, North East Ambulance Service, St John's Ambulance, LA Taxis, ADT and any others that materialise over the course of operation.

The club will also, as far as deemed reasonable by the Club/Charity, support:

- Those vulnerable to cyber bullying through their association with the Club
- Adults at risk travelling to away games to support the Club's teams

How we aim to protect them

The Club/Charity recognises the importance of having in place a series of support policies and best practice guidelines to support the implementation of the aims and key principles of this policy. It is also recognised that for the implementation of Safeguarding to be most effective, these policies and practices must be supported by a club-wide Safeguarding culture and 'striving to improve' attitude.

The following support policies have been implemented to support this policy:

- Safeguarding Children policy;
- Safer Working Practice Policy;
- Engaging with Vulnerable Groups on Club Premises Policy;
- Equality and Diversity policy;
- Health and Safety policy;
- Staff Anti-Bullying policy;
- Staff Harassment policy;
- Safer Recruitment policy;
- Whistleblowing policy;
- Secure Record Keeping and Data Storage;
- Data Protection policy;
- Use of Photography and Images policy;
- Social Media and Safer Internet policy;
- Spectator Safety policy;
- Complaints policy and Club-wide Disciplinary procedure;
- Trips, Tours & Travelling Away with U18's policy;
- Providing accommodation for children & young people staying away from home policy;
- Club wide Code of Ethics
- Various departmental Codes of Conduct



Best Practice Procedures and Guidelines

As part of the embedding process, the club/charity will also support the above policies through incorporating numerous Best Practice Procedures and Guidelines in, but not limited to, the following areas;

Recruitment:

As part of the Club/Charity's safer recruitment and selection process, all positions of employment are subject to assessment to ascertain whether the position involves working with adults at risk. This will be carried out pre-employment by the Club/Charity's Human Resources team. Where positions have been identified as working with adults at risk, subsequent offers of employment are subject to a satisfactory Disclosure and Barring Service Enhanced Disclosure and appropriate references.

Criminal Records Checks:

The Club/Charity is registered with the Disclosure and Barring Service ("DBS") who provide a disclosure service for organisations. Disclosures enable employers to undertake more thorough recruitment and selection procedures for positions which involve working with adults at risk.

DBS disclosures are processed for the Club/Charity by the online company Online Disclosures. Through their service there are 3 levels of checks staff can be asked to undertake; a Basic Disclosure, Standard Disclosure and an Enhanced Disclosure. The level of check staff undertake will be dependent on their role and the level of contact they will have with adults at risk for the purpose of their job role. The level DBS disclosure is outlined for staff in the Club's Safeguarding Workforce Development Plan.

The process for DBS disclosures is;

New Appointments:

Each different job role within the Club/Charity will, by nature, involve different levels of contact and engagement with children and young people and adults at risk. All staff who are offered a position which involves working within regulated activity with adults at risk will be required to undertake an Enhanced Disclosure check. All employment offers are subject to the outcome of this screening process and when applicable, this is set out in their Offer of Employment. Until such time as their Disclosure certificate has been seen/sanctioned by the Head of HR and/or the Safeguarding Officer and/or a Verifier, the new member of staff will not be allowed to commence employment or, if deemed appropriate, will not be left unsupervised with adults at risk.



The Club/Charity is committed to the equal opportunities of its staff and therefore if a positive Disclosure is not received it will not result in an instant dismissal from employment. Should a negative Disclosure be received, the Club/Charity's 'Handling a Disclosure with Content' process will be applied. During this process the Club will undertake a thorough assessment of the information disclosed and attempt to understand the nature of the conviction(s) disclosed (including barring from working with children or adults at risk), the date when the conviction(s) occurred and details of any mitigating circumstances. Depending on the outcome of this investigative process the Club may choose to terminate employment or sanction employment subject to a suitable risk assessment and control actions. In respect to this process, each case will be treated individually on a case by case basis. Any action required as a result will be subject to the details of this investigative procedure only.

New Appointments who already have a Disclosure certificate:

If a new member of staff has been checked by their previous employer, they are still required to undertake another check prior to their start date.

Existing Staff:

All staff who have responsibilities for leading activities, or who spend a significant part of their job in contact with children have been checked by the Club/Charity. In accordance with the best practice guidelines offered by DBS, all staff complete a Disclosure check every 3 years.

Volunteers:

Volunteers play an important role within the activities of the Club/Charity and their contribution is valued and significant. However, the Club/Charity recognises that there is still a requirement to criminal record check volunteers in the same capacity as if they were employed members of staff.

Volunteer Disclosures are offered free of charge by the Online Disclosure service and as a result the club will endeavour to ensure every volunteer is DBS checked accordingly.

It should be outlined that, in order to accommodate the administration costs of this process, a volunteer disclosure will only be undertaken if a commitment is made by the volunteer to undertake work on any given programme for a period lasting more than six weeks or more. If volunteering for less than this six weeks the volunteer will not require a DBS disclosure. As best practice a Risk Assessment for their involvement will be undertaken by the programme or activity leader and all involvement of the volunteer will be supervised at all times by an employed member of staff with the agreed level of DBS Disclosure.

For volunteers undertaking 'work experience', a DBS disclosure will not be undertaken due to the length of the placement being typically less than 6 weeks. In this situation the same Risk Assessment and supervision procedures outlined above should be applied. Should the 'work



experience' last for the duration of more than six consecutive weeks, an assessment will be made to whether a DBS disclosure should be undertaken.

Temporary Staff and External Consultants:

In the event of temporary staff or external consultants being required a Self-Declaration form must be fully completed and signed and they will not have unsupervised access to adults at risk during their time with The Club/Charity.

Staff Induction:

During the induction process of new staff this policy and specific guidance is given out and talked through. Key to this process is staff understanding the expectations of them from a Club/Charity perspective and to familiarise themselves with the policies and procedures expected. At induction stage, staff will also be aligned to the Club/Charity Safeguarding Workforce Development Plan with training needs identified.

Staff Training:

All staff working in direct contact with adults at risk shall be required to complete a degree of Safeguarding training. However the level and depth of such training is dependent on the level of contact with adults at risk their job role requires. The Club/Charity take a personalised approach to this and apply a needs specific approach to all staff members in the Club. This approach identifies the level of training each staff member requires and is presented in the Club/Charity's Safeguarding Workforce Development Plan.

Typically the training courses staff will undertake will include, but are not limited to the Newcastle Safeguarding Adults Board's Safeguarding Level 1, 2, 3 or 4 courses and the Premier League's Safeguarding workshops and training courses. Other more specialised courses may also be identified and included as part of the individualised approach of the Safeguarding Workforce Development Plan.

Details of those satisfactorily completing this course are retained by the Head of Safeguarding, Welfare and Equality.

Health and Safety:

The Club/Charity's Health and Safety Policy gives guidance about ensuring the safety of adults at risk to those whose roles involve working with them on a regular basis. Where an adult at risk is involved in an activity, a risk assessment must take account of their particular vulnerabilities whilst they are in the Club/Charity's care. The risk assessment should set out what arrangements are in place for their care and supervision, examples of such risk assessments are kept with the Head of Safeguarding, Welfare and Equality, Health and Safety Officer and/or relevant Heads of Department.



Confidentiality and Data Protection:

The Club/Charity takes the protection of data seriously. Often, if a Safeguarding incident has taken place, 'Sensitive Data' is generated which must be treated accordingly. As part of this policy and the Club/Charity's Data Protection policy, staff are required to understand the importance of confidentiality as well as how to record, process, store and handle sensitive data.

The Club/Charity's Confidentiality and Data Protection Policy is in line with current legislation (Data Protection Act, 1998) and the General Data Protection Regulation (GDPR). The Data Protection Act (1998) is a Parliamentary act that was passed to protect people's personal information and the GDPR gives strict guidance as to how the data of individuals should be processed and handled by organisations throughout Europe. It is important to remember there can also be significant consequences to sharing information inappropriately.

That said, staff should also remember that sharing information is essential in enabling early intervention and preventative work within Safeguarding and there can also be significant consequences to not sharing information relating to safeguarding concerns.

To help with this, staff should remember that the Data Protection Act (1998 and 2018) and the General Data Protection Regulation (GDPR) are not necessarily barriers to sharing information but instead provide a framework to ensure that personal information is not misused. Both do, however, identify the need for the Club/Charity, who hold ultimate responsibility for the sharing of information, to ensure there is a lawful basis for processing information, consent for data sharing has been sought (as far as possible) and that appropriate joint data processor or controller terms are in place with the relevant external organisations. Where consent is not possible, the impact of data sharing (or not sharing) should be assessed in order to consider whether there is a legitimate interest or lawful basis upon which data can be shared without consent.

Staff must be vigilant when it comes to data processing and where they feel safeguarding related information should be shared externally they should use their professional judgement to decide when they should seek further advice. Such advice can be discussed directly with the Safeguarding & Welfare team

To help staff in their approach to data protection, there are seven golden rules which should be followed:

1. Remember that the Data Protection Act is not a barrier to sharing information
2. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared and seek their agreement, unless it is unsafe or inappropriate to do so



3. Seek advice if you are in any doubt, without disclosing the identity of the person where possible
4. Share with consent where appropriate and where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your professional judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement of the facts of the case.
5. Consider safety and wellbeing at all times and base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
6. Ensure the information shared is **Necessary, Proportionate, Relevant, Accurate, Timely** and **Secure**. This means, ensure the information you share is necessary for the purpose for which you are sharing, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with who and for what purpose.

Further information regarding data sharing, dealing with Subject Access Requests and dealing with data breaches can be found in the Club/Charity's Data Protection Policy and supplementary guidance documents.

Activities for Disabled Persons:

All activities carried out for disabled persons are carried out under the guidelines of the Disability Discrimination Act.

Working with partner organisations:

Working in the Community:

The scope and nature of the Club/Charity's work will also engage with adults at risk from the local communities and quite often, such events will be based externally to the club and will require access to local facilities and assistance from staff.

Where events take place at external community venues it is the responsibility of the venue management to carry out the relevant 'site based' risk assessments. The Club/Charity accepts responsibility for undertaking 'activity based' risk assessments and pre – session checks. In terms of Safeguarding, where external venues have Safeguarding policies and procedures in place, it is requested that these venues share such information and best practice.



If venues do not have any, or not as robust Safeguarding systems in place as required, the Club/Charity will request the adoption of their own Safeguarding policies and procedures for the duration of the event or work being undertaken.

Working with funders, sponsors and other external partners:

The Club/Charity will always act as the lead Safeguarding 'driver' in any situations which require working with partner organisation in a lead capacity. However, the Club/Charity is always open to sharing and adopting other partners 'Best Practice' if it is demonstrably more appropriate or simply better than the provision in place.

More specifically, when working with funders, sponsor and other external partner organisations the Club/Charity is committed to establishing an agreed set of Safeguarding standards for all co-operative work. Unless it is demonstrably evident that a funder's, sponsor's or partner organisation's Safeguarding practices are better than those of the Club/Charity, this process will involve using the Club's working practices as the minimum standards to be adopted by all.

Guidelines in the Event of Concern

Highlighting Concern:

Although we are committed to doing the utmost to safeguard adults at risk from harm there may be an occasion when concern is raised over the treatment of an adult at risk.

'Abuse' and 'neglect' are generic terms encompassing all ill treatment of adults at risk as well as cases where the standard of care does not adequately support an adult at risk's health or development. Adults at risk may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Harm may occur anywhere in a Club/Charity activity or it can be reported to a Safeguarding Officer or representative of the Safeguarding Team when it has occurred outside a Club/Charity activity.

There are complex scenarios associated with the potential for harm. These include:

- Adults at risk playing, officiating, coaching, spectating or administering within a variety of activities at the Club/Charity. Adults at risk may be vulnerable to harm from other adults who may or may not be vulnerable themselves. Those doing harm to the adult at risk may be in the Club/Charity activity or elsewhere in the adult's network. Harm may be deliberate or result from not understanding the adult at risk's needs (commission or omission).
- Adults at risk may be at risk of harming others in Club/Charity activities either by deliberate behaviours or by failing to understand their responsibilities to others. On these occasions the adults at risk may need help and support to manage his or her



behaviour in a suitable way, or may need to have certain responsibilities removed from them. Safeguards and/or Risk Assessments may need to be put in place to protect others.

- Adults who have been 'vulnerable' in the past who are now 'not vulnerable' (example: people recovering from mental health issues). Where these adults are seeking positions of responsibility at the Club/Charity, but have criminal records or issues from their past which are directly related to these periods of vulnerability, detailed risk assessments will be undertaken. Assessment of suitability for their new roles requires a specific knowledge base and sensitive handling. Whilst the Club/Charity promotes a policy of inclusion, the risk assessments are conducted to measure the risk posed by somebody who is recovering from a previous period of vulnerability and considering other adults at risk who need safeguarding from possible harm, should the risk factors re-emerge.
- Adults at risk may also be at risk of harming themselves through failing to realise and report when they need additional or different support in Club/Charity activities.

As far as possible such complex scenarios should be considered within any decision making processes involving adults at risk and any person who has a concern in relation to adults at risk should air on the side of caution.

Where members of staff work directly with adults at risk, the following six key principles should be considered at all times:

Empowerment:

People are supported and encouraged to make their own decisions and informed consent.

'I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens'

Prevention:

It is better to take action before harm occurs.

'I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help'.

Proportionality:

The least intrusive response appropriate to the risk presented is adopted.

'I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed'.

Protection:

Support and representation for those in greatest need is always offered.



'I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want'.

Partnership:

Local solutions through services working with their communities is utilised. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

'I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me'.

Accountability:

Accountability and transparency in delivering safeguarding is adopted at all times.

'I understand the role of everyone involved in my life and so do they'.

All members of staff employed by the Club must acknowledge the Club has a responsibility to protect all adults at risk it engages with. This responsibility can be summarised by the following 5 step process.

RECOGNISE → RESPOND → REPORT → RECORD → REFER

Recognise – Types, Signs and Symptoms of Abuse

Abusive behaviour can be assessed on a scale from poor practice, to bad practice to abuse. Abuse cannot be easily measured as an action alone. Its severity will partly be defined by the:

- Vulnerability of the victim and the power differential
- Nature and extent of the abuse
- Length of time it has been occurring
- Impact on the individual or group
- Risk of it being repeated or becoming increasingly serious

At one end of the scale, there may be obvious signs and symptoms of abuse, but at the opposite end, the indicators may be very difficult to detect. Combinations of factors which individually might not give cause for concern could be much more worrying when considered together. The abuse may be committed by one individual against another or be institutional in that the whole organisation colludes in abusive practices either through ignorance or choice.

'The Care Act 2014 identifies ten categories of abuse as follows; should you have any concern that abuse is occurring you should contact a Safeguarding Officer immediately.



Physical abuse

Physical abuse involve physical acts that cause harm including:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- restraint
- inappropriate physical sanctions

Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional
- so called 'honour' based violence

A new offence of coercive and controlling behaviour in intimate and familial relationships was also introduced into the Serious Crime Act 2015 and this offence will impose a maximum 5 years imprisonment, a fine or both. The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together, or family members, sending a clear message that it is wrong to violate the trust of those closest to you, providing better protection to victims experiencing continuous abuse and allowing for earlier identification, intervention and prevention. The offence criminalising coercive or controlling behaviour was commenced on 29 December 2015.

Sexual abuse

Behaviour of a sexual nature to which to which an adult at risk has not consented, or could not consent or was pressured in consenting to, including:



- rape
- indecent exposure
- sexual harassment

- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography
- subjection to pornography or witnessing sexual acts
- indecent exposure
- sexual assault
- sexual acts to which the adult has not consented or was pressured into consenting

Psychological abuse

Behaviour that adversely affects or targets the emotional wellbeing of an adult at risk abuse through:

- emotional abuse
- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling
- intimidation
- coercion
- harassment
- verbal abuse
- cyber bullying
- isolation
- unreasonable and unjustified withdrawal of services or supportive networks

Financial or material abuse

Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults and children at risk. Financial recorded abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring. Although this is not always the case, everyone should also be aware of this possibility. Examples of such abuse include:

- theft
- fraud
- internet scamming
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- the misuse or misappropriation of property, possessions or benefits



Potential indicators of financial abuse include:

- change in living conditions
- lack of heating, clothing or food
- inability to pay bills/unexplained shortage of money
- unexplained withdrawals from an account
- unexplained loss/misplacement of financial documents
- the recent addition of authorised signers on a client or donor's signature card
- sudden or unexpected changes in a will or other financial documents

This is not an exhaustive list, nor do these examples prove that there is actual abuse occurring. However, they do indicate that a closer look and possible investigation may be needed.

Modern slavery:

Although slavery is illegal in every country in the modern world it still exists and even by the narrowest definition of slavery it's likely that there are far more slaves now than there were victims of the Atlantic slave trade. Examples of such abuse include:

- slavery
- human trafficking
- forced labour and domestic servitude.
- traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Discriminatory abuse:

Unacceptable behaviour directed towards an adult at risk including:

- harassment
- slurs or similar treatment:
- because of race
- gender and gender identity
- age
- disability
- sexual orientation
- religion

Organisational abuse:

Includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This



may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission:

Neglect and acts of omission may include:

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

Self-neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

Incidents of abuse may be one-off or multiple, and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm, just as the CCG, as the regulator of service quality, does when it looks at the quality of care in health and care services. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. In order to see these patterns it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include:

- serial abuse, in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse
- long-term abuse, in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- opportunistic abuse, such as theft occurring because money or jewellery has been left lying around

Wider Considerations:

Considering the role and status of the Club/Charity within the local community, it is considered that the Club/Charity must also maintain a position whereby they stay informed



in terms of up-to-date guidance and practical support on specific safeguarding issues. Examples of such issues are listed below and in support of this, staff are encouraged to access the associated websites in order to gain an understanding of the issues themselves and how they may affect their own job roles and responsibilities.

- Bullying including cyberbullying
<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- Domestic violence
<https://www.gov.uk/guidance/domestic-violence-and-abuse>
- Faith abuse
<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>
- Female genital mutilation (FGM)
<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>
- Forced marriage
<https://www.gov.uk/guidance/forced-marriage>
- Gender-based violence/violence against women and girls (VAWG)
<https://www.gov.uk/government/policies/violence-against-women-and-girls>
- Mental health
<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>
- Preventing radicalisation
<https://www.gov.uk/government/publications/channel-guidance>
- Sexting
<https://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean/>

Signs and Symptoms of Abuse



In many cases, the signs and symptoms of abuse can be very difficult to spot. Abusers, by nature, often act to conceal their actions which makes abuse difficult to identify and victims of abuse are often too ashamed, embarrassed, frightened or intimidated to disclose abuse is taking place. They are also sometimes unaware of abuse taking place.

However, that said, there are still signs and symptoms that, if witnessed or acknowledged, are a cause for concern.

Typically, there are two categories of signs and symptoms of abuse that staff should be aware of; behaviour of adults that causes concern and signs and symptoms of abuse amongst victims. The recognition of the signs and symptoms associated with either category could act to Safeguard an adults at risk and prevent abuse taking place and staff are expected to be aware of such behaviours, signs and symptoms and act accordingly if they have concerns about an adult they work with.

The most identifiable signs and symptoms of abuse are:

- Unexplained bruising and injuries to uncommon injury sites (such as fleshy, meaty parts of the body such as biceps) or in a particular shape or pattern (such as a grasp mark)
- Sudden changes in behaviour such as being withdrawn
- Loss of weight for no apparent reason
- A change observed over a long period of time
- Something an adult at risk has said
- Incidents of controlling, coercive, or threatening behaviour, violence, or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality
- Evidence of dehydration, malnutrition, untreated or improperly attended medical conditions, and poor personal hygiene
- Evidence of unsanitary or unclean living quarters (e.g., animal/insect infestation, no functioning toilet, faecal/urine smell)
- Inappropriate and/or inadequate clothing, lack of the necessary medical aids (e.g., eyeglasses, hearing aids, dentures)

Of course, there are other signs and symptoms of abuse and the list above is not exhaustive. If staff have any concerns about an adult at risk, they must respond to and report their concerns or suspicions.

In terms of behaviours that cause concern, staff must be aware it can be very difficult to identify behaviours that are outright abusive and as a result staff should exercise caution when deciding whether to report a person's behaviour as suspicious. However this policy supports staff fully who, after careful consideration, are concerned about the behaviour of another individual and encourages them to report their concerns with conviction in line with the responding and reporting procedures outlined below.

Behaviours that may cause concern include:



- Excessive contact with or over friendliness or familiarity towards an adult at risk
- Persistent and unnecessary creation of opportunities to spend time alone with an adult at risk
- Inappropriate physical contact with an adult at risk

- Cagey, suspicious behaviour and an unwillingness to share information about themselves that is consistent with everyday interactions
- Something a person says regarding the person whose behaviour is questionable
- Persistent disregard or manipulation of rules, particularly Safeguarding rules and regulations, to account or justify behaviours

As with the signs and symptoms of abuse outlined above, there are other behaviours that would cause concern the list above is not exhaustive. If staff have any concerns about a person's behaviour, they must respond to and report their concerns or suspicions in line with the reporting procedures outlined below.

Responding to a Report or Suspicion

Creating the atmosphere for someone to tell you what is wrong

If abuse is suspected as taking place, it is very important to try and create the opportunity for a person to disclose what is happening and it is crucial that those potentially being abused are given the confidence to know that they will be listened to. In some situations, the worst thing to do might be to keep asking if everything is alright. In others, a few encouraging prompts might be just what the person was waiting for.

The coordinator of each activity involving adults at risk must ensure that the participants know how to get help, how they can report abuse, who to report it to and what response they can expect.

Some people who have been abused are able to speak to someone about it and are willing for action to be taken. Others however, can be very reluctant to talk about the experience. There may be several reasons for this:

- It may just be too painful emotionally to talk about what happened. Feelings of shame and embarrassment often inhibit people reporting concerns
- There may not be an opportunity to see someone who is trusted, privately
- There may be anxiety about repercussions from the perpetrator or others if the abuse is reported
- There may be a worry about "where it will all end", for example if the police are told, or perhaps a fear of going to court
- The abused person may just be prepared to put up with it
- Communication and language may be an inhibitor
- The person may not recognise an experience to be abusive if their previous life experiences have been confusing



In addition to the concerns listed above, inhibitors could include:

- Not being believed
- Effects of stigma
- Powerlessness, lack of choice, power differences
- Fear of a continuing oppressive regime
- The perceived victim could have confused feelings towards the abuser

The following might help to create the right atmosphere:

- Identifying a named person responsible for safeguarding for each team or activity who is a familiar face to the participants. This measure is intended to be empowering for the service-users.
- Where abuse is suspected, identify the member of staff the person appears to like or trust the most. Create an opportunity for the person to share their concern with an identified staff member.
- Where there is factual evidence available, it may be useful to let the person know it has been observed so that the person does not feel they are telling about something that is a complete surprise
- Because the person might be worried about losing control of the situation if they tell, it might be helpful to give assurances that after disclosing abuse, the person is always asked what they wish to do about it. You could refer to Making Safeguarding Personal here.
- Respect will be given to their wishes, but there are various circumstances where it will be necessary to report a concern against a person's wishes, particularly when others would be left at risk. Where possible, attempts should be made to ascertain consent but where this is not granted and it is felt a report is required, staff should not guarantee that you will keep to yourself what they want to tell you.
- The reasons for overriding consent should be explicit. Consent should be overridden when
 - The person lacks the capacity to understand the risks
 - Others are at risk
 - A crime has been committed
 - The person is at significant risk of harm
 - Their decision not to provide consent has been influenced by fear of the perpetrator, threats, controlling or coercive behaviour

Making Safeguarding Personal (MSP) is also a sector led initiative which aims to develop an outcomes focus to safeguarding work, and a range of responses to support people to improve or resolve their circumstances. It is about engaging with people about the outcomes they want at the beginning and middle of working with them, and then ascertaining the extent to which those outcomes were realised at the end.



Key points to remember about disclosure

- Many incidents of abuse or crimes only come to light because the abused person themselves tells someone
- You must be aware that the person may not appreciate the significance of what they are sharing. They may not realise or accept they are being abused
- Disclosure may take place many years after the actual event or when the person has left the setting in which they were afraid
- Even if there is a delay between the actual event and the disclosure – you should demonstrate to the person that you believe them unless it is absolutely clear and provable that the events they are describing could not have happened. There may still be a reason that they are disclosing which should be explored further.

Managing a disclosure

Any or all types of abuse may be the result of the deliberate intentions, negligence or ignorance of the perpetrator and incidents of abuse may be multiple, either to one person repeatedly or to more than one person at a time.

If you suspect abuse is taking place, or a report/allegation of abuse has been disclosed to you, where possible a Safeguarding Officer or the Head of Safeguarding, Welfare and Equality must be contacted as early as possible. However it is recognised that an individual may need to respond to a situation immediately and without consultation, if the nature of the suspicion or report is putting the Adult at Risk concerned in immediate danger.

With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Staff should:

- Stay calm and try not to show shock
- Be aware of the possibility that medical or criminal evidence might be needed
- Treat any allegations extremely seriously and act at all times towards the adult at risk as if they believe what the person is saying
- Listen carefully rather than question the person directly, be sympathetic and offer reassurance
- Tell the adult at risk:
 - They are right to disclose the information
 - They are treating the information seriously
 - It was not their fault
 - What they are doing, when & keep them up to date with what is happening
 - They must inform the Safeguarding Officer and/or the Head of Safeguarding, Welfare and Equality of the information or another Safeguarding team member if these are not available. They may also need to tell the person they must inform the police depending on circumstances.



- Take further action – they may be the only person in a position to prevent future abuse
- Write down everything said (in their words as far as possible) and what was done – accuracy and detail is important
- Seek medical attention if necessary
- Report to their Manager in addition to the Safeguarding Officer/Manager as soon as possible
- Where appropriate, record on a body map (sample attached as Appendix C) the location of any bruises, cuts or abrasions
- Keep the person informed of action taken and include them in decision making ensuring that their views are taken into account (MSP)

Staff should not:

- Make promises they cannot keep
- Interrogate the person – it is not their job to carry out an investigation – this will be up to the police and social care, who have experience in this
- Cast doubt on what the person has told them – they shouldn't interrupt or change the subject
- Say anything that makes the person feel responsible for the abuse

DOING NOTHING IS NOT AN OPTION – STAFF HAVE A RESPONSIBILITY TO ACT

Staff should make sure they tell a Safeguarding Officer or Head of Safeguarding, Welfare and Equality if not available, as soon as possible. They will know how to follow this up and where to go for further advice. Appendix A, shows flow charts for the process of reporting concerns however staff should also be issued with department specific copies which should be referred to if and when necessary.

Recording Allegations or Suspicions

On reporting an allegation or suspicion, the Safeguarding Officer or Head of Safeguarding, Welfare and Equality will ask for a written factual statement from the person making the report. It is important you have kept accurate and detailed records about all aspects of the allegation or suspicion. The templates provided in Appendix B and C should be used to assist with the process.

In summary, the information staff will need to record includes:

- Name, date of birth, address of the alleged victim
- Name, date of birth, address of the alleged perpetrator (if available)
- Who you are and how you are involved
- What happened, where and when (including any lead-up)
- Any action taken



- The current position including any concerns about safety of the alleged victim and any other person
- Who else is involved?
- How aware of the referral is the victim, perpetrator, carers or relatives
-
- Any known view of the alleged victim regarding how they wish the matter to be dealt with
- Any other background information that is likely to be helpful.

If the report involves an allegation about another member of staff, the adult at risk of harm may be asked to make a statement regarding the allegation, where possible. Support will be offered in this regard if deemed as required. Any statement made by the adult at risk should be reported in their own words and these reports should be confined to facts and should not include any opinion, interpretation or judgement.

The Club/Charity will ensure that any adult at risk involved is immediately removed from any possible risk of harm.

All investigations into possible abuse will require careful management. The Head of Safeguarding, Welfare and Equality will seek the advice of The Football Association Safeguarding Children & Adults Team, Local Safeguarding Adults Board or the Police before setting up any internal inquiry and take their advice on case handling. In any case of suspected abuse, as soon as the local Adult Social Care Department has been informed, a report must be provided to the PL/FA Head of Safeguarding.

Establishing the victim's wishes

When working with adults at risk, it is important to understand that the victim of abuse is an adult and as a result it is appropriate to consider the victim's wishes in relation to the handling of any incident. In any circumstance, it is very important that you do not investigate the concerns, but the following guidance should be followed.

- Liaise with the Safeguarding Officer or Head of Safeguarding, Welfare and Equality
- Where there is no emergency, there is an opportunity to check out the adult's wishes in relation to the concern (MSP)
- There is a need to establish who the victim would most like to talk to about the matter
- If it is a member of staff chosen, prior to any interview they must familiarise themselves with all possible options and seek advice regarding the potential consequences of each option for the victim
- The interview is only about establishing the victim's wishes in terms of what to do about the incident, not about what happened during the incident itself
- The victim should be allowed time to consider the options and if there is uncertainty, afforded the opportunity to meet again



Ensuring the individual is in or is moved to a place of safety

Whatever the nature of the abuse, it is essential that the victim concerned is separated from the person who is or is thought to be producing the threat. It is also important that disruption to the life of the victim is kept to a minimum, therefore, if it is possible for the alleged perpetrator to leave the scene, this should be the preferred option. If this is not achievable, an alternative place of safety should be sought as the immediate safety of the victim is the highest priority

How to get help urgently

Emergency services should be summoned whenever a situation is felt to be beyond the control of members of staff. In addition staff should have, readily available, all the contact numbers of the Head of Safeguarding, Welfare and Equality, Departmental Safeguarding Officer, colleagues, and wider members of the Safeguarding Team or other services which can assist in an emergency or urgent situation.

Role of staff supporting the alleged victim

Members of staff involved in supporting the alleged victim have a key role to play in making sure the correct procedures are followed and that the victim is properly advised and supported. If a number of staff are involved, it may be convenient for one person to take the lead. This is entirely a matter for the Safeguarding Officer or Head of Safeguarding, Welfare and Equality to decide.

The role of the staff supporting the alleged victim includes the following:

- Ensuring the continued safety of and support to the abused adult at risk
- Liaising with immediate colleagues who have been involved in order to gather all the available information together
- Ensuring that evidence has been preserved
- Collating and completing all written material relating to the incident
- Reporting the matter to the Safeguarding Officer at the earliest opportunity

IT IS NOT PART OF THE ROLE OF THE STAFF SUPPORTING THE VICTIM TO COMMENCE AN INVESTIGATION INTO THE INCIDENT

Criminal evidence

Preserving evidence

When obvious cases of abuse have taken place, the first concern for staff is the safety and welfare of the abused person. However, efforts to preserve evidence may be vital as potentially a criminal offence may have taken place.



In all cases, but especially when police involvement is required, preservation of evidence is crucial if a police investigation is to be effective. What staff do or do not do in the time whilst they are waiting for the police to arrive may make all the difference.

The following checklist aims to help staff ensure that vital evidence is not destroyed:

In situations of physical and/or sexual assault:

- In the case of a person who has been physically abused who wishes to show staff an injury, staff should only observe what they consent to show them and what is appropriate
- Staff should not touch what they do not have to. Wherever possible leave things as they are. Staff should not clean up, wash anything or in any way remove fibres, blood etc. If they do have to handle anything at the scene they should keep it to a minimum
- Staff should not touch any weapons unless they are handed directly to them. If this happens, they should keep handling to a minimum. They should place the items/weapons in a clean dry place until the police collect them
- Staff should preserve anything that was used to comfort the abused person, for example a blanket
- Staff should secure the room and prevent entry to anyone unless strictly necessary to support them or the abused person and/or the alleged perpetrator, until the police arrive
- The Police may organise a medical examination urgently

Prior to the arrival of the police and medical examination:

- Staff should ensure that no one has physical contact with both the abused person and the alleged perpetrator as cross-contamination can destroy evidence. It is acknowledged that if staff are working alone in the situation, they may have to comfort both the abused person and the alleged perpetrator e.g. where the alleged perpetrator is also a Club service-user. They need to be aware that cross-contamination can easily occur
- Staff should preserve any bloodied items
- Staff should encourage the victim not to shower
- Staff should encourage the victim not to change clothing
- Even when the victim says they do not want police involvement, staff should preserve items anyway as they may change their mind later
- Staff should encourage the person not to eat or drink if there is a possibility that evidence may be obtained from the mouth



Methods of Preservation

- For most things staff should use clean brown paper, if available, or a clean brown paper bag or a clean envelope. If staff use an envelope, they should not lick it to seal. They should avoid using plastic bags as they can produce moisture
- For liquids staff should use clean glassware
- Staff should not handle items unless necessary to move and make safe. If there are latex gloves available staff should use them

It is acknowledged that completion of all of the above tasks may not be possible in a traumatic situation. Staff are urged to do the best that they can.

Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff is that no guarantee of confidentiality can be given to an adult at risk.

An adult at risk should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present.

There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring a safeguarding issue to a Safeguarding Officer or the Head of Safeguarding, Welfare and Equality. The key issue is that the welfare of the adult at risk is protected.

Whistle Blowing

Members of the workforce should not feel any discomfort towards reporting concerns or incidents surrounding the conduct or practice of fellow workforce members particularly if the details of the poor practice contravenes law, club policy or protocol and especially if it endangers fellow employees or participants.

In line with the Club/Charity whistleblowing policy, failure to act upon information or suspicions could lead to disciplinary or criminal action.

External Contact Details

In many cases, on handling a report/allegation of abuse, the Head of Safeguarding, Welfare and Equality and Safeguarding Board will often seek or refer the incident to the Local Authority Adult Care Team or the LA MASH (Multi Agency Safeguarding Hub), in line with the Care Act 2014..

It should be noted, for reporting/referral purposes, the location of activities or individuals when the abuse took place may impact on which Local Authority the Club/Charity works with. For example, due to the Club's Training Ground being located in a different district to



that of the Club's home, St James' Park, any Safeguarding incidences occurring on this site may need to be referred to a different Local Authority.

For all other purposes, the Club/Charity will, assume advice/guidance from the Newcastle Adult Social Care as this is the Local Authority for the Club's home and base, St James' Park.

Newcastle Safeguarding Adults Board

In Newcastle, Local Authority provision comprises of a Safeguarding Adults Board made up of representatives from the Council, NHS, Police, Probation Housing and the community and voluntary sector. The Safeguarding Adults Board makes sure that all organisations work closely together, using the same policies and procedures, to protect and prevent abuse of adults at Risk.

In line with this, it should be noted that this policy is reviewed by a member of the Safeguarding Adults Team yearly as part of the Club's annual/seasonal review process with the intention of ensuring the policy adopts and endorses the 'Best Practice' guidance Newcastle Safeguarding Adults Board promotes.

From a practical perspective, if you think an adult at risk is being abused you can access guidance from the [Newcastle Safeguarding Adults Board website](#) where links can be found to advice and guidance.

You can also contact Community Health and Social Care Direct where your concerns will be treated seriously. If you tell Adult Social Care that you are concerned about an adult at risk, social workers need to find out more. The law says that social workers must ask questions to find out if an Adult is vulnerable to or at risk of harm.

If the matter needs to be referred, in the absence of the Safeguarding Officer or Manager you can also download and complete a [Referral and Initial Information Record Form](#).

There are also procedures on the NSAB website which set out the process how allegations of abuse made against a person who works with adults at risk will be handled by the Local Authority. Information sharing and recording processes are underpinned by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018

There may be up to 3 strands in considering a concern or an allegation:

- A police investigation of a criminal offence
- Enquiries and assessment by Adult Social Care about whether an adult at risk is in need of protection or support of services
- Consideration by an employer of disciplinary action in respect of the individual (or other appropriate action if the individual is not an employee)



If an allegation relating to an adult at risk is made about a person who undertakes paid or unpaid care of adults, consideration must be given to the possible need to alert those who manage them in that role.

If you have concerns about the welfare of an adult at risk and there are no members of the Club's Safeguarding team available to contact, staff can contact:

Community Health and Social Care Direct

Tel: 0191 278 8377 (open Monday to Friday, 8am – 5pm)

Text-phone No: 0191 278 8359

Email: scd@newcastle.gov.uk

Any contact outside of office hours must be directed to the:

Emergency Duty Team

Tel: 0191 278 7878

For further information as to how a referral is handled once it has been passed to the Local Authority Safeguarding Board, please refer to Appendix D of this Policy.

Further Support and Advice

For allegation/reports that occur outside the district of Newcastle, the Head of Safeguarding, Welfare and Equality will contact the relevant Local Authority Safeguarding Board. Should they be unavailable, the Newcastle Safeguarding Adults Board will assist with any signposting that is required.

Depending on the nature of the incident or concern, you may also need further support:

If you think that a crime has been committed against a child, you should contact:

The Police

Tel: 999 (in the event of an emergency)

Tel: 101 (In the event of non-emergency)

If you wish to seek further advice regarding any concerns you may have, you may also contact:

The Football Association / NSPCC Safeguarding Children & Adults Helpline

Tel: 0808 800 5000 (Help for adults concerned about a child)

Text-phone for Deaf Users: 0800 056 0566



www.thefa.com/football-rules-governance/safeguarding

The Premier League Head of Safeguarding (Jess Addicott)

Tel: 0207 8649000

Email: safeguarding@premierleague.com

Further guidance on safeguarding adults at risk can also be sought via the Ann Craft Trust (ACT) at www.anncrafttrust.org. ACT are funded by Sport England to safeguard adults in sport and activity.

ACT

Tel: 0115 9515400

Queries regarding the Disclosure and Barring Service should be directed to:

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Disclosure & Barring Service

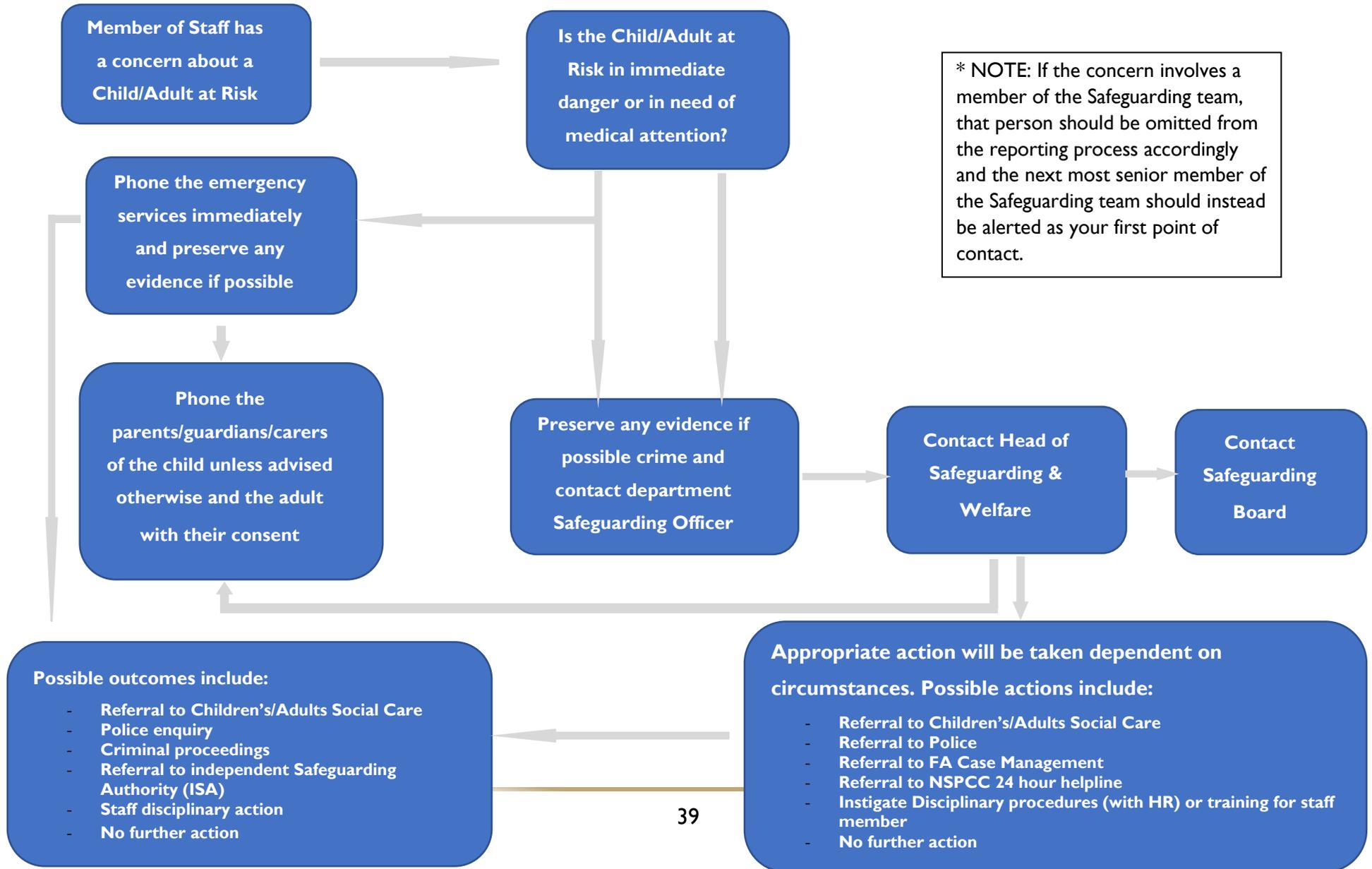
Tel: 0300 020 0190



APPENDICES

Appendix A

Staff procedure for reporting Safeguarding concerns





Was there an injury?	Yes / No	Did you see it?	Yes / No
Describe the injury:			
Have you filled in a body map to show where the injury is and its approximate size?			
Yes / No			
Was anyone else with you? Who? Their position?			
Who are you passing this information to?			
Name:		Position:	
Date:		Time:	
Your signature:		Date:	
Action taken by Safeguarding Officer:			
Safeguarding Officer Signature:			
Date referred to Head of Safeguarding & Welfare:			

Action taken by Head of Safeguarding, Welfare and Equality:

Report/referral made to...?

Local Authority

Police

Premier League

The FA

School/Team

Parents

Other

Safeguarding

/Carers

Board

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

Safeguarding

Officer

Safeguarding

Board

Club

H.O.D

Person who recorded

disclosure

Other

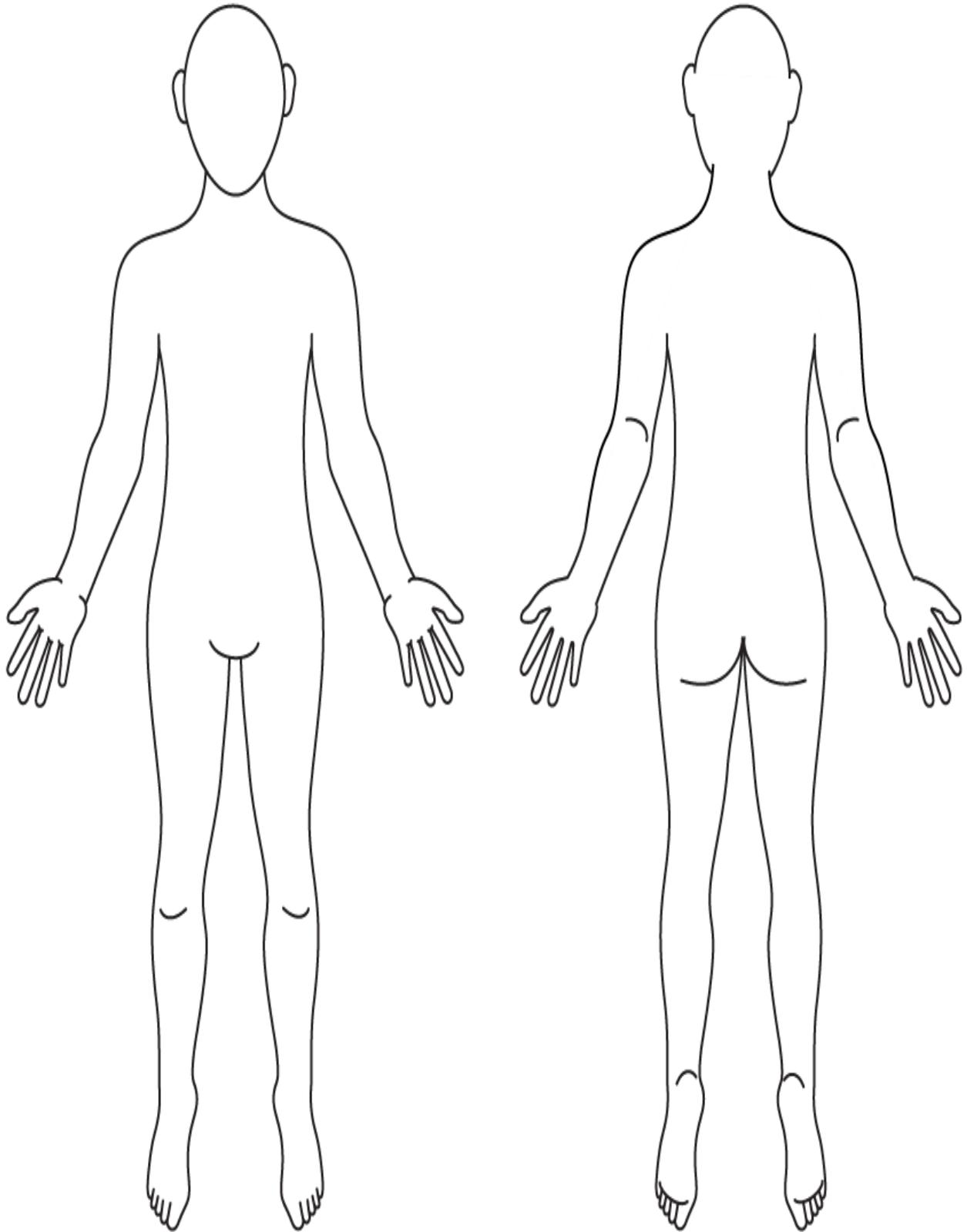
Head of Safeguarding & Welfare name:

Head of Safeguarding & Welfare Signature:

Date:

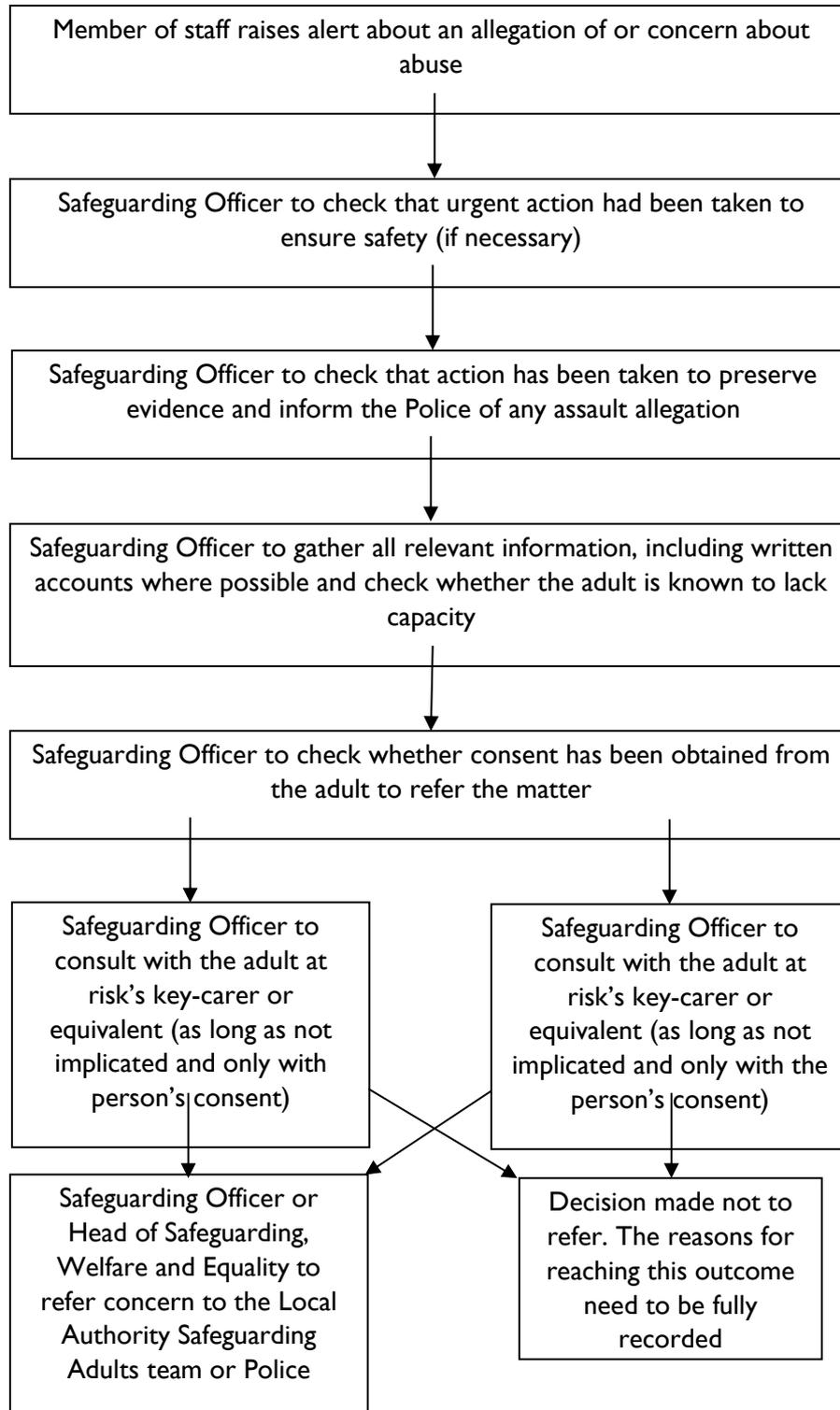
Appendix C

Body Maps



Appendix D

Safeguarding Officer Making a Referral



Appendix E

Newcastle Safeguarding Adults Board stages of a Safeguarding Adults (Section 42) Enquiry

