



# Safeguarding Policy

Safeguarding & Wellbeing Department

Core Policy | v12 November 2025



## Policy Endorsement

Every organisation that works with vulnerable groups must ensure it promotes their wellbeing effectively. Safeguarding is of paramount importance and is everyone's responsibility.

Our commitment to safeguarding is clear;

*Newcastle United Football Club is fully committed to being a place where everyone is safe, heard, valued and able to thrive. We will constantly strive to develop excellence in safeguarding and welfare through enhanced awareness and continuous learning.*

*We are United in our shared accountability for safeguarding.*

At the heart of good safeguarding is culture and at the heart of our culture are our values. They provide clarity on the behaviours that are most important to us whilst re-iterating our sense of unity and belonging – we are a family, United As One.

Our sense of family is moulded through our 'descriptors' and where safeguarding is concerned, how we create 'environments in which all are respected, supported, and valued,' and 'ways of working that enable everyone to be their authentic self and to be and feel at their best' is key.

We recognise poor practice and abuse can happen and that we all have a part to play to prevent it. In practice, this means we are proactive, vigilant and recognise the importance of our policies, procedures, and training. It also means we value working together with our safeguarding partners and stakeholders to ensure our approach remain current, contextual, and effective.

Newcastle United is a club steeped in heritage that enriches the lives of many. We understand this and are therefore fully committed to ensuring it remains a safe place where individuals can learn, develop, and flourish.

David Hopkinson

Chief Executive Officer



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## Key Policy Definitions

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

**Child(ren)** – any person aged under 18 years of age.

**The Club** – A collective term that can be considered to refer to Newcastle United Football Club, Newcastle United Boys and Girls Academies, Newcastle United Men's and Women's Training Grounds and St James' Park. It includes the workforce and activities undertaken at these premises and may also refer to third parties with an entrusted responsibility for delivering club-supported activity.

**The Football Association (the FA)** – 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 3<sup>rd</sup> party abuse or inappropriate behaviour.

**Local Authority** – Refers collectively, or individually when named, to the district, borough, city, and county councils responsible for governance of the county of Northumberland. Specifically, these are Newcastle City Council, Gateshead Metropolitan Borough Council, North Tyneside Metropolitan Borough Council and Northumberland County Council.

**Newcastle Safeguarding Adults Board** – the Newcastle Safeguarding Adults Board (NSAB) is the multi-agency partnership responsible for safeguarding adults with care and support needs in Newcastle. It is responsible for overseeing, co-ordinating and challenging the effectiveness of the work of its members and partner agencies. It produces the multi-agency safeguarding adult's policy and procedures which this policy reflects.

**Newcastle Safeguarding Children Partnership** – The Newcastle Safeguarding Children Partnership (NSCP) acts on behalf of the three Safeguarding Partners of the locality of Newcastle upon Tyne, namely Newcastle City Council, Newcastle Gateshead Clinical Commissioning Group and Northumbria Police, and works to bring together partner agencies across the city to ensure there is a joined-up approach to safeguarding. Newcastle United FC are active members of the NSCP.

**The Premier League** – Refers to the organisation responsible for governance and administration of English Football's highest ranked league.

**Safeguarding** – Preventative and reactive measures taken to ensure the risk of harm or mistreatment of vulnerable groups is minimised and best possible outcomes are achieved.

**Vulnerable Group(s)** – A collective term used to refer to both Children and Adults at Risk.

**Welfare** – The health, happiness and fortunes of individuals associated with NUFC.



## I. Introduction

Safeguarding can be broadly defined as ‘protecting something from harm or damage with an appropriate action or measure’.

At Newcastle United FC, we view safeguarding as our responsibility to create safe, secure and engaging environments that enable all those who engage with us to experience great outcomes and support achievement of potential. We believe everyone has the right to participate in our activities safely and inclusively. This policy acknowledges our responsibilities to ensure vulnerable groups, which include children and adults at risk of harm, are safe by acting to inform and guide people on the procedures and requirements relating to safeguarding children and adults at risk at the Club.

### Scope

The obligations set out within this policy are mandatory for all individuals we engage with; our procedures and requirements relating to safeguarding vulnerable groups are equally applicable to all employees, volunteers and agency workers and to all of the activities which the Club undertake.

This policy also extends to all partners, contractors, stakeholders, players, participants and supporters who engage in activities run by the Club and it is the responsibility of those of our employees who manage our relationships with these groups to share this policy and to check understanding of and agree adherence to it alongside their own separate Safeguarding policies and procedures (where such policies and procedures exist).

### Safeguarding Governance

The Club’s approach to safeguarding is underpinned by legislation, statutory guidance and identified best practice. Specific legislation underpinning this policy includes, but is not limited to:

- Children Act (1989 & 2004) (England & Wales)
- Children And Social Work Act (2017)
- Children And Families Act (2018)
- Sexual Offences Act (2003)
- Education Act (2002)
- The Data Protection Act & the UK GDPR (2018)
- Apprenticeships, Skills, Children & Learning Act (2009)
- Mental Capacity Act (2005)
- Safeguarding Vulnerable Groups Act (2006)
- Care Act (2014)
- Human Rights Act (1998)
- Equality Act (2010)
- Protection of Freedoms Act (2014)
- Domestic Abuse Act (2021)
- UN Conventions On The Rights Of The Child (1992)

Specific statutory and best practice guidance underpinning this policy includes, but is not limited to:

- Working Together To Safeguard Children (2018)
- Keeping Children Safe In Education (2022)
- What To Do If You’re Worried A Child Is Being Abused: Advice for Practitioners (2015)
- Mandatory Reporting Of Female Genital Mutilation (2016)
- North & South Of Tyne Safeguarding Children Partnership Procedures Manual (2019)
- Newcastle Safeguarding Partners Multi Agency Safeguarding Arrangements For Children And Young People (2019)
- Newcastle Safeguarding Adults Board Multi Agency Safeguarding Policy (2018)
- Newcastle Safeguarding Adults Board Multi Agency Safeguarding Procedures (2018)



Safeguarding in Football is also governed by rules, regulations and guidance as set out by the Football Association (FA), the Premier League (PL) and the English Football League (EFL). Rules, regulations and guidance informing this policy include, but are not limited to:

- Working Together To Safeguard Football – FA Policy & Procedures
- FA Laws of the Game
- FA Safeguarding Concerns in the Professional Game: Referral and Thresholds guidance
- Premier League Rules
- Premier League Safeguarding Policy
- Premier League Safeguarding Standards
- Premier League Guidance for Safer Working Practices

More details regarding Football's Safeguarding frameworks can be found at:

- The FA: <https://www.thefa.com/football-rules-governance/safeguarding>
- The Premier League: <https://www.premierleague.com/safeguarding>

## 2. Our Commitment to Safeguarding

Newcastle United Football Club is committed to being a place where everyone is safe, heard, valued and able to thrive. We will constantly strive to develop excellence in safeguarding and welfare through enhanced awareness and continuous learning. We are United in our shared accountability for safeguarding.

This shared commitment to safeguarding is reflected in the Club's safeguarding resources and our Safeguarding Team is a source of expertise and support to enable us all to meet our safeguarding responsibilities.

Safeguarding is everyone's responsibility, and we must all be accountable for considering safeguarding implications when planning and delivering all aspects of our work. We want to ensure that all departments and individuals are equipped to deliver on their safeguarding accountabilities as it is only by having safeguarding truly embedded across our organisation that we can fulfil our commitment to keep everyone safe.

### Our Core Safeguarding Principles

To achieve this, our core safeguarding principles underpin all safeguarding work we do.

These principles are:

1. The welfare of any child or adult at risk is, and must always be, considered paramount.
2. Children and adults at risk have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity or their personal circumstances, family life or previous life choices.
3. All adults have a responsibility to safeguard children and/or adults at risk.
4. Adults who work with children and/or adults at risk are responsible for their own actions and behaviours and must always ensure they behave in a way that would not lead any reasonable person to question their motives or intentions for working with children and/or adults at risk.
5. Children and adults at risk deserve to be respected, valued and listened to.
6. Parent, carers and other family members should always be encouraged to be involved in any relationship that exists between a child or adult at risk and the Club, unless it is unsafe or deemed inappropriate to do so.



## Our Safeguarding Expectations

Safeguarding is everyone's responsibility. This means the Club expect all adults engaging with children and/or adults at risk through Club activities to proactively work to ensure these environments are safe and enjoyable. The club considers this responsibility to amount to a 'duty of care'.

All employees, volunteers, agency workers, partners, contractors, stakeholders, players, participants and supporters are therefore expected to:

- Prioritise the safeguarding of individuals above all other outcomes and report all concerns, allegations or incidents immediately.
- Avoid favoritism and ensure all children and adults at risk are treated fairly by attempting to meet their individual needs without prejudice or discrimination.
- Establish appropriate professional boundaries with children and adults at risk by ensuring all contact and interactions (both face to face and online) are undertaken in line with Club policies, guidance and standard operating procedures.
- Understand and respect that a relationship of trust exists between adults in positions of authority and vulnerable groups engaging with activities. For clarity, this means personal sexual relationships between adults responsible for delivering activities on behalf of the Club (positions of authority) and children aged 16-17 or adults at risk participating in such activities are considered unacceptable, despite the participants being of the age of sexual consent.
- Promote a culture of safeguarding and welfare at the Club where best practice is championed and poor practice or abuse is challenged and reported.
- Be aware that breaches of Club policies may result in disciplinary action being taken. In some circumstances they may also amount to a breach of the law and could result in criminal action.

All employees, volunteers, agency workers, partners, contractors, stakeholders, players participants and supporters must never:

- Abuse, harm or exploit any person associated with the Club , or neglect their basic needs.
- Use their position or association with the Club to establish inappropriate relationships with children or adults at risk of harm.
- Use their position or association with the Club to access information relating to other people for their own or other's advantage.
- Access pornography on Club premises, via any device.
- Take, make, circulate, or possess any indecent photograph or pseudo photograph of a child under 18 years.

Additionally, employees, volunteers, agency workers, partners, contractors must never:

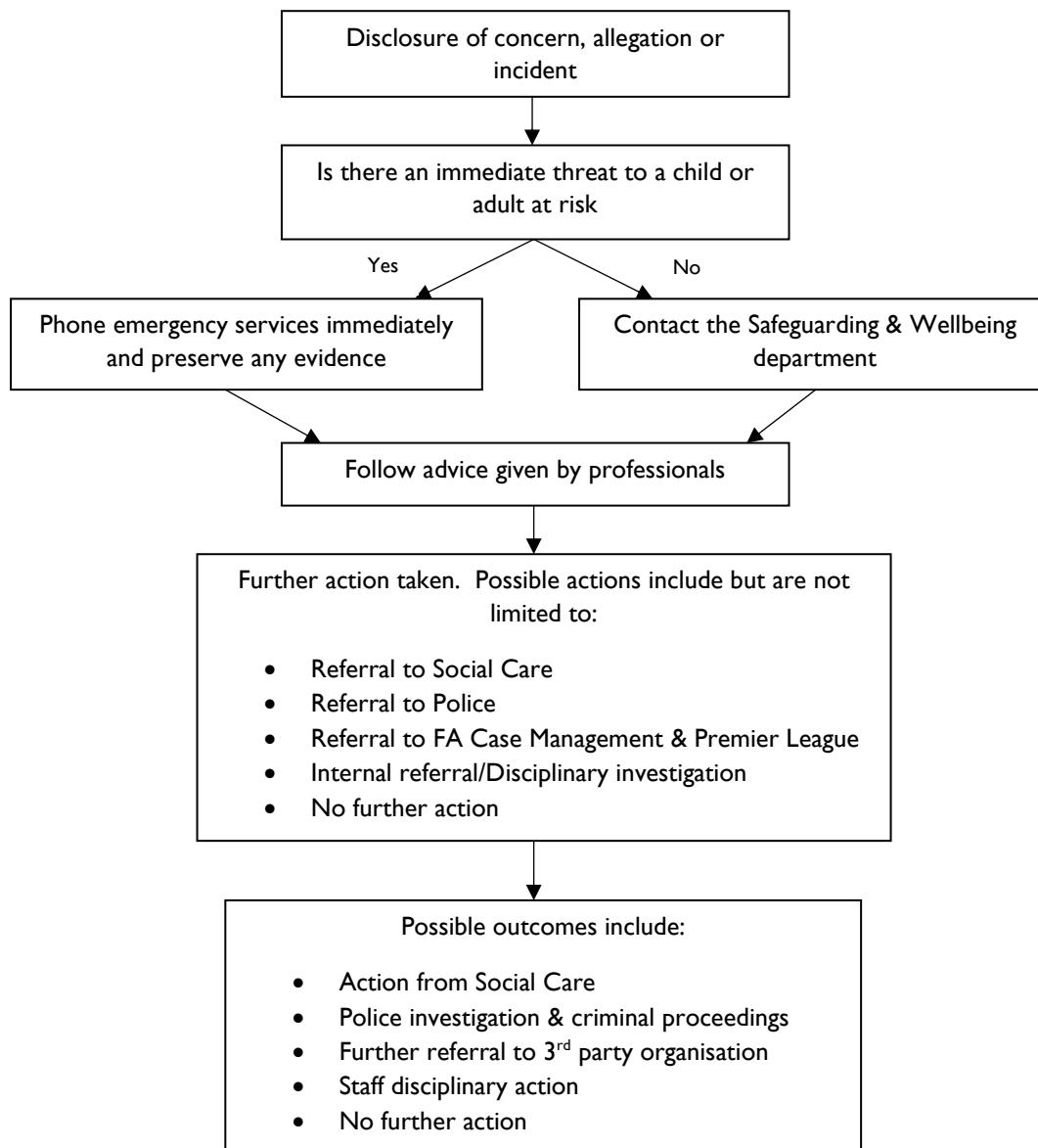
- Use physical or emotional punishment to discipline children or adults at risk.
- Have sexual relationships with Adults at Risk who are identified as being NUFC or NUF participants
- Engage in any sexual activity, or have discussions about such activities, with children, except in a clear educational context and with the knowledge of parents or carers.
- Engage in any sexual activity, or have discussions about such activities, with adults at risk, except in a clear educational context and with the knowledge of parents or carers where it is deemed the adult does not have capacity to self-consent.

In practice, adults responsible for delivering club activities should adopt a 'think safeguarding' approach to their delivery and be proactive in managing safeguarding risks associated with the activities. Effective planning, consultation and evaluation processes are considered essential to supporting safe delivery.



### 3. Procedure for Action

The following flow chart documents the standard procedure that employees, volunteers, agency workers, partners, contractors, stakeholders, players, participants and supporters must follow in the event of concerns, allegations or incidents arising.



#### Key points to note:

**Disclosure:** A disclosure is the process by which a person lets another person know that they have concerns regarding someone or something or that an incident has happened. In safeguarding terms, this could mean abuse or poor practice taking place and in welfare terms, it could mean ill-health or detrimental circumstances are being experienced. Disclosures may not happen all in one go and can be a slow process that takes place over a long period of time. Further information on responding to disclosures can be found on p.16.

**GDPR:** Where concerns are about a child, establishing the child's wishes and their parent/guardian's consent to share the concerns (data) is preferable. Where concerns are about an adult, if they have capacity to self-consent for their data to be shared then this should also be attained. However, in all cases, concerns can be shared without consent if the person sharing the data believes it is necessary to:

- Protect an individual from neglect or physical, mental or emotional harm; or
- Protect the physical, mental or emotional well-being of an individual.

Further information about data protection in the context of safeguarding can be found on p.20 and in Appendix B.

**Escalation:** If staff are concerned or dissatisfied with the action/advice given at any stage, they should escalate matters. Where concerns/dissatisfaction relates to a member of the safeguarding team's practice then escalation should be via that person's line manager. Where concerns/dissatisfaction relates to the Police, advice on escalation should be sought from the Safeguarding & Wellbeing team.





## 4. Additional Resources

To support staff to meet their obligations, the Club has developed a suite of additional policies, guidance documents and standard operating procedures (SOP's). These include, but are not limited to, how the club safely recruit individuals into the organisation and how staff can work safely with vulnerable groups. Staff working at the Club are also expected to undertake safeguarding training as part of their role.

Adults working with Children and/or Adults at Risk on behalf of the Club at risk are expected to identify and familiarise themselves with any policies, guidance documents and standard operating procedures relevant to their departments and roles and ensure their contents are always followed.

These can be accessed via the Club's internal intranet system. This can be accessed here: <https://login-prod.jostle.us/login.html?clientType=rich>

In the event staff are unsure which policies, guidance documents and standard operating procedures are relevant to their roles, or they are unclear on what constitutes best practice, they are expected to consult with the Safeguarding and Welfare Team.

### Our Safeguarding & Wellbeing Team

The Club employ a dedicated team of Safeguarding and Wellbeing specialists whose role is to provide guidance and support and to work proactively to create a culture of collective accountability. Staff are expected to consult with the Safeguarding and Wellbeing department regularly so to support effective planning, delivery and evaluation of activities.

The Safeguarding & Wellbeing can be contacted follows:

#### **Safeguarding & Wellbeing Manager - Club & Partnerships**

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## 5. Working with Vulnerable Groups

The term 'vulnerable groups' is a collective term used to describe children and adults at risk of harm. It is generally accepted that children and adults at risk of harm are the most vulnerable people in society.

A child is defined by the Law as any person aged under 18 years of age. Although we are committed to doing our utmost to safeguard children from harm there may be occasions when concerns are raised over the treatment of a child.

An adult at risk is a person aged 18 or over who has need for care and support (whether or not those needs are being met) and is at risk of abuse or neglect or is unable to protect themselves against abuse or neglect as a result of those needs.

Care and support needs might be as a result of either physical, mental, sensory, learning or cognitive disabilities or illnesses, substance misuse or brain injury. A formal diagnosis of the condition is not required. As with safeguarding children, despite our commitment to ensure adults at risk are always effectively safeguarded, there may be occasions when concerns are raised over the treatment of an adult.

In the context of Club operations, the Club will generally consider behaviour towards vulnerable groups across the following categories.

### **Best Practice**

The term 'best practice' is used a lot in the context of safeguarding. It is a broad term used to describe actions and behaviours that are considered to be 'the most effective they can be' in terms of keeping people safe. Adults involved in the delivery of Club activities should strive to embed best practice within all activities delivered.



## Poor Practice

Poor practice is a generic term used to describe practices and behaviours that are not 'the most effective they can be' in terms of keeping children safe and if left unchallenged could result in abuse. Often such practices and behaviours are unintentional or are simply the result of misplaced good intentions but they can also be deliberate and planned.

## Low Level Concerns

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the threshold to be considered an allegation or requiring a referral to the local authority. They may include concerns that an adult may have behaved in a way that:

- Is not consistent with the Club's Code of Conduct or general expectations of behaviour.
- Raises questions about that adult's suitability to work with children, even if the behaviour occurred outside of work or is not linked to a particular act or omission.
- Does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO)
- Is in contradiction to industry guidance on low level concerns.

If any individual has a low-level concern about an employee's conduct, they should report this to the Safeguarding and Welfare team and/or the HR team immediately.

## Abuse

The term abuse describes actions or inactions towards children or adults at risk that result in a poor standard of care, the ill treatment or the abuse of these individuals. It includes acts of neglect and may occur in a number of different settings such as within Club activities or within a family, community or institutional setting. Abuse can be committed by anyone, including family members and peers.

## Safeguarding Children: Abuse Children May Suffer

Working Together to Safeguard Children (2018) defines the following four main types of abuse:

### **Physical Abuse:**

"A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child."

Possible signs and indicators of physical abuse include, but are not limited to:

- Marks, bruises, cuts, fractures, bite marks, burns or scalds that cannot be explained rationally in the context of 'normal life'.
- Untreated or recurrent injuries
- Refusal to discuss injuries
- Skin being kept covered by clothing in hot weather
- Injuries that have unusual shapes (e.g. shape of an object or hand print)
- Responding to ordinary interactions with adults or other children by flinching or instinctively moving away from them as if in anticipation of being physically hit.
- Inconsistent accounts for the cause of injuries
- Presenting as if drowsy or intoxicated (possibly by virtue of being given too much medication or inappropriate substances)

### **Emotional Abuse:**

"The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are



worthless or unloved, inadequate, or valued only insofar as they meets the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone."

Possible signs and indicators of emotional abuse include, but are not limited to:

- Isolation or becoming withdrawn
- Low mood/change in demeanour
- Being overly agitated or aggressive
- Difficulty in controlling emotions
- Lack of social skills
- Difficulty in establishing and maintaining relationships
- Fear of failure/making mistakes

### **Sexual Abuse:**

"Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children."

Possible signs and indicators of sexual abuse include, but are not limited to:

- Genital and stomach pain, injury or infection
- Pregnancy and/or incontinence
- Difficulty walking or sitting
- Use of sexualised or overly mature language
- Low self-esteem
- Demonstrating knowledge of sexual behaviour disproportionate to age
- Inappropriate sexualised behaviours
- Inappropriate or unusual affection

### **Neglect:**

"The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Post birth, neglect may involve a parent or carer failing to:

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b. protect a child from physical and emotional harm or danger
- c. ensure adequate supervision (including the use of inadequate caregivers)
- d. ensure access to appropriate medical care or treatment

Neglect may also include a failure to act and/or unresponsiveness to, a child's basic emotional needs."



Possible signs and indicators of neglect include, but are not limited to:

- Poor hygiene & looking untidy and unkempt
- Malnutrition and hunger
- Frequent tiredness
- Being greedy when presented with food
- Persistently wearing clothes and equipment that is too small in size
- Stealing food/objects/money
- Excessive periods of absence
- Being left alone for long periods of time

### **Child-on-Child Abuse:**

Children can be abused by other children as well as adults. Where any kind of abuse takes place between children we will consider this to be child-on-child abuse. The impact of child-on-child abuse is significant and can affect a child's wellbeing and emotional development in later life.

Child-on-child abuse is most likely to include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (including activities involving harassment, abuse or humiliation used to initiate a person into a group. This may also include an online element)

In addition, it should be recognised that down playing certain behaviours as 'just banter' can lead to a culture of acceptance, unacceptable behaviour and unsafe environments that normalises abuse for children and young people. Even where there are no reports of child-on-child abuse occurring it does not mean it is not happening. Staff must be vigilant in respect of child-on-child abuse and understand the importance of challenging inappropriate behaviour between children as the club has a zero-tolerance approach to such abuse.

There are systems in place for children to report child-on-child abuse to the Club, via the Safeguarding & Welfare team, but staff should be mindful that their own relationships with children may mean children choose them to disclose abuse to. If staff witness or have concerns that child-on-child abuse may be happening, they must inform the Safeguarding & Wellbeing Team immediately.

### **Other Categories of Abuse Children May Suffer**

In addition to the four main types of abuse, we also recognise that abuse may take many other forms. Additional information on other categories of abuse can be found in appendix A.



## Safeguarding Adults: Abuse Adults at Risk May Suffer

'The Care Act 2014 identifies ten categories of abuse adults at risk may suffer. These are:

- Physical abuse
- Domestic abuse
- Sexual abuse
- Discriminatory abuse
- Self-Neglect
- Psychological abuse (emotional)
- Modern Slavery
- Financial or material abuse
- Neglect or acts of omission
- Organisational

Of these ten categories, the following four have already been defined in this policy. These are:

- Physical abuse
- Sexual abuse
- Psychological abuse (emotional)
- Neglect or acts of omission

However, the definitions of these categories of abuse are different to that associated with the abuse of children so redefining them is considered necessary:

### **Physical Abuse:**

Physical abuse involves physical acts that cause harm including:

- Assault
- Hitting
- Slapping
- Pushing
- Misuse of medication
- Restraint
- Inappropriate physical sanctions
- Assault

### **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 or Material Abuse may include:

- Having money or other property stolen,
- Being defrauded
- Having money or other property misused
- Being put under pressure in relation to money or other property, and

Possible signs and indicators of financial abuse include, but are not limited to:

- Being unable to afford modestly priced essential goods and services
- Disparity between a person's standard of living and known employment status
- Knowledge of unusual payments or money transfers
- Poor hygiene and looking untidy and unkept
- Signs of financial hardship couples with knowledge that a person's finances are being managed by somebody else

Typically, adults at risk are the most common targets for financial abuse, but it can also happen to children. For example where children are aged between 16 and 18, are employed and able to earn/accumulate an income as a result.

### **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
- Traffickers and slave masters using whatever means they can to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- Forced labour and domestic servitude.
- Human trafficking

Possible signs and indicators of modern slavery include, but are not limited to:

- Appearing to be malnourished or unkempt
- Isolation from the community
- Appearing to be under the control of others
- Living in dirty, cramped, or overcrowded accommodation
- Working for little or no pay
- Signs of physical or emotional abuse
- Lack of personal effects, belongings or documentation
- Appearing frightened and showing an unwillingness to interact
- Fear of law enforcers

### **Discriminatory abuse:**

Unacceptable behaviour directed towards an adult at risk including:

- Harassment
- Slurs or similar treatment due to a protected characteristic

Possible signs and indicators of modern slavery include, but are not limited to:

- Anxiety, anger and frustration
- Activity design not being inclusive
- Isolation or withdrawal
- Expression of not feeling included



### **Organisational abuse:**

Acts of neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment and can be through neglect or poor professional practice because of the structure, policies, procedures within an organisation.

Possible signs and indicators of organisational abuse include, but are not limited to:

- Strict regimes and expectations
- Failure to meet needs/poor care standards
- Failure to respond to complaints
- Inappropriate use of restraints
- High turnover of staff at organisation
- Lack of respect for dignity and privacy
- Interfering with personal matters
- Inappropriate physical intervention

### **Neglect and acts of omission:**

Neglect and acts of omission may include:

- Ignoring medical advice
- Failure to provide access to appropriate health, care and support or educational services
- Emotional or physical care needs
- 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 own personal hygiene, health or surroundings and includes behaviour such as hoarding.

Possible signs and indicators of self-neglect include, but are not limited to:

- Poor personal hygiene
- Unkempt appearance
- Poor living conditions
- Comments regarding lack of self-worth
- Malnutrition, dehydration/poor diet
- Lack of respect for oneself
- Unwillingness to engage with services
- Unwillingness to take medication

### **Domestic Abuse:**

Domestic abuse is behaviour that is controlling, coercive, violent, threatening and manipulative between people in a relationship. It can therefore be psychological, physical, sexual, financial or emotional in nature and can impact children through seeing, hearing or direct actions. The impact of children witnessing such behaviour can cause significant harm and trauma and in many cases can lead to difficulties with behaviour, intimate relationships and mental health later in life.

Possible signs and indicators of domestic abuse include, but are not limited to:

- Aggression or acts of physical violence
- Low mood, self-esteem or withdrawal
- Attention seeking behaviour
- Drug or Alcohol use
- Problems in school or trouble learning
- Fear of going home

It is noted that, in respect to all types of abuse adults at risk may suffer, the severity of abuse will partly be defined by the:

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





At one end of the scale, there may be obvious signs and symptoms of abuse taking place, but at the opposite end, the indicators may be very difficult to detect.

### **Other Categories of Abuse Adults at Risk May Suffer:**

In addition to the ten main types of abuse, we also recognise that abuse may take many other forms. Additional information on other categories of abuse can also be found in appendix A.

## **6. Responding to Concerns, Disclosures or Allegation of Abuse**

Anyone who becomes aware of or suspects abuse is taking place has a moral obligation to take action. The Club expect all adults involved in delivering activities to children and/or adults at risk to report concerns or disclosures and allegations of abuse if they become aware of them.

Such expectations can be summarised into the following simple 4 step process.

**RECOGNISE —————> RESPOND —————> REPORT —————> RECORD**

### **Recognise**

Being clear on what constitutes a safeguarding concern, disclosure and allegation is an essential part of 'recognising' abuse taking place. Everyone involved in Club activity must remain open minded to the potential for abuse to occur and alert to signs and indicators that it is occurring.

The Club define a safeguarding concern as:

*"an inclination or suspicion that a child or adult at risk is suffering, or is at risk of suffering, significant harm or abuse."*

This is different to a welfare concern, which is considered to be:

*"a more generalised fear or worry in relation to the health, happiness, wellbeing and development of an individual. This includes both physical and mental health, happiness, wellbeing and development"*

A safeguarding disclosure is the process by which a person lets someone know that abuse is taking place. It may not happen all in one go and may be a slow process that takes place over a long period of time. It may also occur via one or more different methods as follows:

- Direct disclosure: this is a specific statement made about the abuse that is happening
- Indirect disclosure: one or more ambiguous statements, which imply that something is wrong.
- Behavioural disclosure: deliberate or inadvertent behaviour that indicates something is wrong.
- Non-verbal disclosure: writing letters, drawing pictures or trying to communicate in any other way than verbal to let someone know that something is wrong.

Sometimes, a partial disclosure of abuse will also take place but this does not mean that it should be taken less seriously than a full disclosure. It must be remembered that those suffering abuse may not feel ready or know how to tell someone they are being abused.

A safeguarding allegation means it is suspected a person who works with children or adults at risk has:

- Behaved in a way that has harmed, or may have harmed, a child or adult at risk
- Possibly committed a criminal offence against or related to a child or adult at risk
- Behaved in a way that indicates they may pose a risk of harm to children or adults at risk



Examples of behaviours that may indicate a risk of harm include:

- Excessive contact with or over friendliness or familiarity towards a child or children
- Persistent and unnecessary creation of opportunities to spend time alone with a child or children
- Inappropriate physical contact with a child or children
- Cagey, suspicious behaviour and an unwillingness to share information about themselves that is consistent with everyday interactions
- Something a person says regarding the person who's behaviour is questionable
- Persistent disregard or manipulation of rules, particularly Safeguarding rules and regulations, to account or justify behaviours

Allegations are different to complaints which are generally considered to be:

*“dissatisfaction at the standard of provision in respect of any activity or service delivered by the Club.”*

The Club have standalone complaints policies in place to deal with complaints as and when they arise. Incorporated into these policies are mechanisms to consider whether complaints consist of safeguarding allegations or concerns.

### Respond

Where safeguarding concerns, disclosures or allegations are recognised as arising, the response of those receiving such information is key to ensuring best outcomes are achieved.

### **Managing a concern**

If there are safeguarding concerns for safety of any individual, adults responsible for delivering club activities are expected to ensure the immediate safety of those at risk. This may mean contacting the emergency services or seeking support from the Safeguarding and Welfare team.

Where immediate safety is not a concern but abuse is still suspected then it may be appropriate to try and create the opportunity for a disclosure to be made. The following might help to create an opportunity for disclosure:

- Identifying a named person responsible for safeguarding for each team or activity who is a familiar face to the participants.
- 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 this 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 disclosing something as a complete surprise.

### **Managing a disclosure**

Where a disclosure is made, it will likely be necessary to respond immediately, without consultation, especially if the disclosure suggests a child or adult at risk is in immediate danger.

The following guidelines should be followed when responding to a disclosure

- Stay calm and try not to show shock
- Ensure the individual is safe and contact emergency services where required
- Be aware of the possibility that medical or criminal evidence might be needed
- Treat any allegations seriously and act in a way that confirms belief in what is being said
- Listen carefully rather than question the person directly
- Be sympathetic and offer reassurance
- Tell the person:
  - They are right to disclose the information and you are treating it seriously



- It was not their fault
- What you are doing, when & keep them up to date with what is happening
- You must inform the Safeguarding and Welfare team of the information and other professionals where appropriate (e.g. Police).
- 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
- Keep the person informed of action taken and include them in decision making as far as possible, ensuring that their views are taken into account

Adults responsible for delivering club activities should not:

- Make promises that are impossible to keep
- Interrogate the person – it is not their job to carry out an investigation – if required this will be done by 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

It is imperative that those making a disclosure always feel as though they are being taken seriously, will be supported and kept safe. Similarly they must never be given the impression that they are creating a problem by disclosing abuse or concerns and must never be made to feel ashamed for making a report. Where there are safeguarding concerns, as far as possible, the wishes of children and adults at risk should be taken into account when determining what action to take and which services to provide.

### **Managing an allegation**

If someone makes an allegation against an adult responsible for delivering club activities, the person receiving this allegation must ensure the allegation is treated seriously and handled sensitively. Where any allegation is made, the individual receiving such information must:

- Reassure the person making the allegation that they are taking what they say seriously
- Inform the person making the allegation that in the event they are told something very serious they are duty bound to report the information
- At the first opportunity make notes in relation to the details of the allegation
- Treat any information shared confidentially and sensitively. Information must only be shared on a need to know basis.

Where an allegation is made against an employee, a full investigation will be conducted in accordance with the Club's disciplinary and misconduct policies and procedures and staff may face suspension and/or dismissal from employment should their behaviour be found to be unacceptable.

Irrespective of outcome, learning lessons from allegations is important and applies to all cases, not just those that have been concluded and substantiated. Therefore, following any safeguarding allegation against staff, a formal review will be led by the Club's Safeguarding & Wellbeing Team.

### **Supporting an alleged perpetrator**

Where people are accused of behaving inappropriately, dealing with such a situation can be very difficult. Whilst the Club must always ensure all allegations are considered fairly and correct outcomes can prevail, we are also committed to ensuring that individuals against whom allegations are made are given support and guidance to help them deal with such situations. In all



circumstances, the Club's HR & Safeguarding & Wellbeing departments will oversee support for the individual in question.

### **Criminal Evidence**

When obvious cases of abuse have taken place and a criminal offence is suspected, efforts to preserve evidence may be important. In all cases, but especially when police involvement is required, preservation of evidence is crucial if a police investigation is to be effective.

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

- Wherever possible leave things as they are. Do not clean up, wash anything or in any way remove fibres, blood etc.
- Preserve anything that was used to comfort the abused person, for example a blanket
- Encourage victims not to shower or change clothes
- Encourage preservation of items, even if the victim says they do not want Police involvement, as they may change their mind at a later date
- Do not touch things unnecessarily
- Secure the area in which any alleged offence has taken place and deny entry to anyone until the Police arrive
- Preserve any bloodied items
- Ensure no one has physical contact with either the abused person or the alleged perpetrator as cross-contamination can destroy evidence.

How evidence is stored is also important. On the whole, contact with evidence should be avoided completely. However, in the event that inclement weather or other circumstances mean evidence may be destroyed, the following might be used to preserve evidence.

- Clean brown paper bag, if available, or a clean envelope (If envelope is used, do not lick it to seal). Avoid using plastic bags as they can produce moisture
- For liquids use clean glassware
- Use latex gloves to handle items

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

### **Report**

In all circumstances, following initial response, safeguarding concerns, disclosures and allegations must be reported to the Safeguarding & Wellbeing team as a matter of urgency. This is irrespective of whether emergency services have also been called. Failure to do so may be considered a disciplinary matter and in some cases may constitute a criminal offence.

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

### **Confidentiality, Consent and Data Protection**

In certain situation, individuals who have made a disclosure or an allegation may ask for the matter to remain confidential. It is important to remember that no guarantee of confidentiality can be given to any individual disclosing or more widely involved with abuse, although this does not necessarily mean that those close to children and adults at risk, such as parents and carers have to be told. Matters are



considered confidential on a need to know basis meaning those in receipt of concerning information must exercise their professional judgement about who they share information with. Information sharing should always be necessary, proportionate, relevant, accurate, timely and secure and a record should be kept of what has been shared, with whom and for what purpose and the reasoning behind it. The law does not prevent the sharing of sensitive, personal information within organisations so if the information is confidential, but there is a safeguarding concern, sharing it may be justified.

You can find further information on confidentiality, consent and data protection in Appendix B and should contact the Safeguarding & Wellbeing Team for advice and guidance where needed.

## Record

When a concern or disclosure is reported to the Safeguarding & Wellbeing team, they will ask the person who reported the matter to make a written record of concern or disclosure using the Club's case recording and management software.

If an allegation about an employee is made by another employee, the Safeguarding & Wellbeing team will ask the employee reporting the allegation to make a record of allegation using the template provided in Appendix C.

It is important that all records made should be reported accurately and timely so that important details are not forgotten about or omitted. Records should be confined to facts and should not include any opinion, interpretation or judgement where possible. As a minimum they must include:

- A clear, comprehensive summary of the concern
- Details on how the concern was followed up
- Details of actions taken, decisions reached and outcomes
- Names and dates of birth of all individuals involved. Where possible addresses may also be useful

## 7. Further Information

### Non Recent Allegations of Abuse

In some circumstances, where an individual has been a victim of abuse, it may take many years for it to be reported. Where an allegation of non-recent abuse is raised, the Club will always treat this information seriously by following the same procedures outlined above, irrespective of the time frames involved.

### Referrals to Other Agencies

Where safeguarding concerns, disclosures and allegations are deemed to be very serious, they may meet the threshold for referral to other agencies outside the Club. Where a referral is required, it will likely, although not exclusively, be made to one or more of the following agencies:

- The Local Authority
- The FA
- The Disclosure and Barring Service
- The Police
- The Premier League

The Safeguarding and Welfare Team must always lead on the referral of Safeguarding and Welfare referrals to other agencies. Information on how referrals are handled by the Local Authority can be found in appendices D and E.



However, it is noted that staff who raise concerns or have effective relationship with the individuals about whom there are concerns may be asked to support the referral by working directly with social care professionals as part of relevant assessments and by providing information and contexts outside of the home which in turn may allow a contextual approach to harm to be implemented. Where this is the case, staff are expected to co-operate fully, with the support of the Safeguarding & Wellbeing team.

### Additional Vulnerabilities

For some children and adults at risk there are additional factors that will make them even more vulnerable to abuse. These are sometimes called 'additional vulnerabilities'.

Particular additional vulnerabilities that those working with children and adults at risk should look out for include:

- Disabilities
- Race and racism
- Informal carers
- Looked after children
- Emotional or mental health issues
- Those exploring their sexuality and identity
- Children who take on leadership roles
- Talented children

It is important for all adults working with vulnerable groups to recognise and in turn be mindful of the implications of these vulnerabilities by considering them in the planning and delivery of activities. If unsure, the Safeguarding and Welfare team should be consulted.

### Escalation procedures

Where a concern has been raised with the Club and the reporting party feels their concerns have not been dealt with appropriately by the Club then that person may escalate the matter directly to the Premier League and/or the Football Association.

### External Contact Information

In event an individual needs to seek support for or refer a safeguarding matter externally to the Club, the following contact information may be useful.

### **Newcastle Safeguarding Partnership**

Information regarding safeguarding arrangements in Newcastle can be found at <https://www.newcastlesafeguarding.org.uk>

There is also information on this website regarding how allegations of abuse made against a person who works with children will be handled by the Local Authority's. If individuals have concerns about the welfare of a child and there are no members of the Club's Safeguarding team available to contact, staff can contact:

- Initial Response Service - 0191 277 2500
- Out of Hours Emergency Duty Team - 0191 278 7878

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



- Adults Social Care (Mon-Fri, 8am – 5pm) - 0191 278 8377
- Adults Social Care (Evenings & Weekends) - 0191 278 7878
- <https://www.newcastlesafeguarding.org.uk/report-a-concern/>

If individuals have concerns about an adult who may have contact with children or adults at risk and there are no members of the Safeguarding team available to contact, staff can contact:

- Local Authority Designated Officer (LADO) - 0191 2116730
- Out of Hours Emergency Duty Team - 0191 278 7878

### **The Football Association**

If urgent Safeguarding support cannot be accessed via the Club Safeguarding team, the FA's Safeguarding team can be contacted directly on **0808 800 5000** (Help for adults concerned about a child) or via a Textphone service on **0800 056 0566**

Anonymous concerns can also be raised directly via [whistleblowing@thefa.com](mailto:whistleblowing@thefa.com)

### **The Premier League**

If necessary, individuals may contact the Premier League's Safeguarding Team via

- Tel: 0207 8649173
- Email: [safeguarding@premierleague.com](mailto:safeguarding@premierleague.com)

# APPENDICES



## Appendix A

### Additional Types of Abuse Children and Adults at Risk Might Suffer

#### **Bullying:**

The government's guidance document titled 'Preventing and Tackling Bullying – Advice for Head teachers, staff and governing bodies' (2017) defines bullying as:

"Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences."

Possible signs and indicators of bullying include, but are not limited to:

- Being frightened of certain people, places or situations
- A reluctance to attend activities
- Sudden loss in friends or avoidance of social situations
- Lost or damaged clothing and/or personal belongings
- Changes in mood and behaviour
- Changes in eating habits
- Low self-esteem

#### **Grooming:**

The NSPCC describe grooming as;

"Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them."

Whilst the definition above related to children and young people, adults with care and support needs can also be groomed.

Possible signs and indicators of grooming include, but are not limited to:

- Receipt of gifts or money from adults or unknown sources
- Spending time away from home or excessive periods of time with particular persons
- Additional and exclusive 1-2-1 support
- Removal from social circle/friends group
- Persistently made to feel special and more important than other children
- A child having an older boyfriend or girlfriend or a relationship that might be deemed inappropriate
- Acting secretly

#### **Online/Cyber Abuse:**

In modern society, the internet and social media plays an integral part in everyone's lives and whilst this can be hugely positive, it can also pose serious risks. Abuse can happen online.

Online abuse is any type of abuse that happens via the internet or social media. Most commonly such abuse happens via social networking sites, online games and chat rooms although abuse experienced as a result of using mobile phones may also be considered 'online'. By engaging in such internet based activities children and adults at risk may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

### Content:

Being exposed to illegal, inappropriate, or harmful content. For example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

### Contact:

Being subjected to harmful online interaction with other users. For example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

### Conduct:

Online behaviour that increases the likelihood of, or causes, harm. For example: making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

### Commerce:

Risks such as online gambling, inappropriate advertising, phishing and or financial scams.

As with other types of abuse, children and adults at risk can be at risk of online abuse from people they know, as well as from strangers and online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). It may also be the case that the abuse only happens online (for example persuading children or adults to take part in sexual activity online).

Possible signs and indicators of online/cyber abuse include, but are not limited to:

- Spending an unusual amount of time on or offline
- Being secretive about who a child/adult is talking to/in contact with and what they are doing online
- Appearing to be controlled by devices that connect to the internet (e.g. smartphone)
- Having an excessive number of 'friends' online
- Use of acronyms or code words when communicating online
- Feeling upset or nervous after being online

### **Radicalisation:**

The government's Prevent Duty Guidance defines radicalisation as

"the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups"

Radicalisation is considered a key part of a process that individuals go through before committing acts of terror and is therefore considered preventable and something that can be stopped or reversed. An important consideration of this process is that it happens over time and there may be signs and indicators of the process happening. Therefore, all adults working with children or adults at risk must be aware of radicalisation and be alert to any signs or symptoms of individuals being radicalised.

Protecting individuals from the risk of radicalisation is part of NUFC's/NUF's wider safeguarding duties. The early intervention and support provided by the Prevent programme addresses the

personal and social factors which make people more receptive to radicalisation, diverting people away from being drawn into violent ideologies and criminal behaviour.

As with managing other safeguarding risks, staff should be alert to changes in a person's behaviour which could indicate that they may be at risk of radicalisation. Staff should report their concerns to the Safeguarding & Wellbeing Team, who may make a safeguarding Prevent referral. If an individual is found to represent a security threat, they will always be referred to the police for further investigation. The local authority or police can discuss the concerns outlined in the referral, suggest how they can best help and provide access to relevant support and advice for the individual.

Consideration of referrals to the Channel programme may be appropriate in some cases but if there is an IMMEDIATE risk of a terror incident taking place you must call 999 or the Anti-Terrorist Hotline on 0800 789321

Possible signs and indicators of radicalisation include, but are not limited to:

- Extremist views and opinions
- Difficulty in hearing and respecting alternative points of view
- Being abusive or distant towards children who are different
- Embracing conspiracy theories
- Converting to or denouncing their religion
- Accessing extremist content online
- Showing sympathy towards extremist ideologies or groups
- Extremist symbolism on clothes, property and belongings.
- Change in behaviour online (such as new or multiple identities)
- Attendance at extremist events both in person and online

### **Exploitation:**

Traditionally 'exploitation' is a term used by safeguarding professional to predominantly describe the Child Sexual Exploitation (CSE). However, more recently, it has been more widely included exploitation for criminal purposes, known as Child Criminal Exploitation (CCE). In Newcastle, it is recognised that sexual exploitation and criminal exploitation can, and does, happen to adults too.

With this in mind, the Club have adopted the following definition of exploitation:

"Exploitation is a form of abuse which occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into any activity that results in a financial or other kind of advantage for the perpetrator or facilitator."

Examples of exploitation include:

- Sexual Exploitation
- Criminal Exploitation
- Financial Exploitation
- Any other exploitation that enables services or benefits of any kind, including: forced marriage, illegal adoption, removal of organs.

Victims may still be exploited even if the activities that they are engaging in appear consensual. Where criminal exploitation occurs, often victims commit crimes themselves and as a result their vulnerability is not always recognised by adults and professionals and they are not treated as victims despite the harm they have experienced. Staff must remember that victims may still have been criminally exploited even if the activities they are involved with appear to be something they have agreed or consented to.

In all cases, those exploiting the child or adult at risk have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common methods of reinforcing this power and prey on the child or adult at risk's limited availability of choice that results from their social, economic and/or emotional vulnerability.

Possible signs and indicators of exploitation include, but are not limited to:

- Unexplained gifts, money or lavish possessions
- Absence from school or work
- Association with known gangs or large groups of individuals
- Being absent from home or activities or excessive periods of time or regularly returning home late
- Knowledge of criminality
- Lack of respect towards others
- Any of the signs and indicators listed for sexual abuse
- Being frightened of certain people, places or situations
- Knowledge of criminality

### **County Lines:**

The National Police Chiefs Council defines County Lines as “a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.”

Possible signs and indicators of County Lines activity include, but are not limited to:

- An increase in visitors/cars to a house or flat
- New faces appearing at a house or flat
- New and regularly changing residents (e.g. different accents compared to local accent)
- Changes in mood and/or demeanor (e.g. secretive/ withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewelry, cars etc.)
- Changes in the way young people you might know dress
- Residents or young people going missing, maybe for long periods of time
- Young people seen in different cars/taxis driven by unknown adults
- Young people seeming unfamiliar with your community or where they are
- Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community
- Unexplained injuries

### **“Cuckooing” / Home Invasion:**

Cuckooing or home invasion is a form of abuse linked to criminal exploitation. Criminals use violence and abuse to target homes of vulnerable people to use them as bases for criminal activity (often drug dealing). Once they gain control, gangs move in with the risk of domestic abuse, sexual exploitation and violence. Sometimes the vulnerable person may be forced to leave their homes, making them homeless. Victims are often adults with care and support needs – in particular those with learning disabilities, mental health needs, or substance misuse issues.

Possible signs and indicators of cuckooing/home invasion include, but are not limited to:

- An increase in people entering/leaving a property
- An increase in cars or bikes outside
- Possible increase in anti-social behaviour
- Increasing litter outside
- Signs of drug use
- Other visitors being prevented from visiting

### **Serious Violence**

All staff should be aware indicators which may signal individuals are at risk from, or are involved with, serious violent crime.

These may include:

- Increased absence from school, college & work
- A significant decline in performance or function
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

These indicators could also suggest children or adults at risk have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. There are also increased risk factors which might increase the likelihood of involvement in serious violence. These include:

- Being male
- Frequent absence or permanent exclusion from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

### **Female Genital Mutilation (FGM):**

The NSPCC describe FGM as: “when a female's genitals are deliberately altered or removed for non-medical reasons. It's also known as 'female circumcision' or 'cutting', FGM is a form of child abuse. It's dangerous and a criminal offence in the UK. We know:

- There are no medical reasons to carry out FGM
- It's often performed by someone with no medical training, using instruments such as knives, scalpels, scissors, glass or razor blades
- Children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained
- It's used to control female sexuality and can cause long-lasting damage to physical and emotional health

Possible signs and indicators of FGM include, but are not limited to:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place in celebration of a girl 'becoming a woman' or 'becoming prepared for marriage'.
- A family arranges a long holiday overseas or travels abroad during summer holidays.
- Reluctance to go to appointments with a doctor or routine medical examinations.
- A girl has an unexpected or long absence from school
- A girl runs away, or plans to run, away from home.
- A girl has difficulty walking, standing or sitting or spends longer in the bathroom
- A girl appears quiet, anxious or depressed.
- A girl acts differently after an absence from school or college.

### **Domestic Abuse:**

Domestic abuse is behaviour that is controlling, coercive, violent, threatening and manipulative between people aged over 16 who are personally connected. Personally connected includes, but is not limited to: people who are or have been married or in a civil partnership, people who are or have been in an intimate relationship and people who are relatives.

It can take many forms, including psychological, physical, sexual, emotional, and economic/financial.

The impact of children seeing, hearing or experiencing such behaviour can cause significant harm and trauma and in many cases can lead to difficulties with behaviour and mental health later in life.

Possible signs and indicators of domestic abuse include, but are not limited to:

- Unexplained physical injuries
- Aggression or acts of physical violence
- Low mood, self-esteem or withdrawal
- Attention seeking behaviour
- Drug or Alcohol use
- Problems in school or work
- Fear of going home

### **Forced Marriage**

HM Government define forced marriage as “where one or both people do not or cannot consent to the marriage, and pressure or abuse is used to force them into marriage.”

Possible signs and indicators of forced marriage include, but are not limited to:

- Physical pressure such as threats and violence
- Emotional pressure such as blackmail, shaming and coercion

### **Mate Crime**

A mate crime is when abusers befriend vulnerable people with the purpose of using their ‘friendship’ to take advantage of and abuse/exploit the person.

Possible signs and indicators of mate crime include, but are not limited to:

- Bills not being paid/sudden lack of money
- Changes in routine or behaviour
- Cut off from established support networks
- Secretive internet or phone usage

## Appendix B

### Additional Considerations for Data Protection

The Club take the protection of data seriously. Often, if a Safeguarding incident has taken place, 'special category data' is generated which must be treated carefully, as under law such data requires more protection. This means those who in receipt of 'special category data' are required to understand exactly how to record, process, store and share it correctly. It is important to remember there can be significant consequences to sharing information inappropriately.

That said, it should also be remembered that effective information sharing is essential in enabling early intervention and preventative work within safeguarding and there can be significant consequences to not sharing information relating to safeguarding concerns. The Data Protection Act (1998 and 2018) and the UK General Data Protection Regulation (UK GDPR) are not necessarily barriers to sharing information and should be considered as providing a framework to ensure that personal information is not misused.

Part of this framework is ensuring there is a lawful basis for processing information. Individuals must always choose the lawful basis that most closely reflects the true nature of their relationship with the individual and the purpose of the processing. The UK GDPR outlines 6 lawful bases for sharing information:

- Consent
- Legal Obligation
- Public Task
- Contract
- Vital Interests
- Legitimate Interests

In relation to consent, the UK GDPR sets a high standard for consent to share information by requiring that it must be specific, time limited and able to be withdrawn. As a result, the Club consider it to be a primary consideration when making decisions about sharing information. In safeguarding terms, this is significant as consent can mean different things in the context of safeguarding children and adults at risk.

Generally speaking, consent for children is usually provided by parents or carers up to the age of 18 although children often self-consent on a range of issues from the age of 16 (engaging in sexual activity for example). In some circumstances children may also be considered mature enough to make their own decisions about issues when aged younger than 16 (sometimes known as Gillick competence or the Fraser guidelines). For some matters, children under a certain age are never considered able to self-consent.

For adults at risk, the situation is slightly more straightforward. On the whole, if an adult is considered capable of granting consent (or not) then they should be allowed to do so. Understanding mental capacity to provide consent is a key issue when working with adults at risk.

In terms of sharing information for safeguarding purposes, the UK GDPR explicitly states that children's personal data merits specific protection and considers children to have the same rights as adults over their personal data. These include the right to:

- Be provided with a clear privacy notice which explains how their data will be processed
- Be given a copy of their personal data
- Have inaccurate personal data rectified and incomplete data completed
- Exercise the right to have personal data erased if they wish.

The UK GDPR also emphasises the importance of asking children to provide consent before sharing personal information providing they are considered competent to do so. Competence is assessed depending upon the level of understanding of the child.

The UK GDPR does not contain specific provisions on capacity to consent but generally it can be assumed that adults have the capacity to consent unless there is reason to believe the contrary but children's capacity to consent will need to be informed by experience of and interactions with the child. If a child is deemed not to have the capacity to make their own decisions, their parent or carers should be asked (unless this would put the child at risk).

Importantly there are also some circumstance where sharing information without consent can be justified. Schedule 8 Section 35(5) of the Data Protection Act 2018 sets out the lawful grounds for processing special category data for safeguarding of children and individuals at risk, including without consent, if the circumstances justify it. This condition is met if:

Processing is necessary for the purposes of:

- Protecting an individual from neglect or physical, mental or emotional harm; or
- Protecting the physical, mental or emotional well-being of an individual.

The individual is:

- Aged under 18; or
- Aged 18 or over and at risk.

On this basis, individuals delivering activities for the Club can feel confident to share information with the Safeguarding & Wellbeing team and/or relevant agencies, providing it is for the purposes outlined above. Examples of when information can be shared without consent include, but are not limited to:

- A person at risk lacks the capacity to understand the risks they are facing
- Others are at risk if information is not shared, or a crime has been committed
- A serious crime may be prevented
- A person is at significant risk of harm
- The decision not to provide consent has been influenced by fear of the perpetrator, threats, controlling or coercive behavior

To help individuals in their approach to data protection, the following 'seven golden rules for information sharing' 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 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's Data Protection Policy and supplementary guidance documents.



## Appendix C



### Recording Safeguarding Allegations Form

Please complete this form and pass it to your departmental Safeguarding Officer and Human Resources Business Partner to report any safeguarding allegation made about another employee.

Full name of staff member	Date of Birth	Department	Your name and position

Nature of allegation	
<p>Please include details of the allegation, including where you were when an allegation was made? What you were told? Who else was there? What did the person say or do and what you said? What did the child/adult at risk say about what they would like to happen next?</p>	
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	
Who are you passing this information to?	
Name:	Position:
Date:	Time:
Your signature:	Date

**Action taken by Safeguarding Officer/ HR Officer:**

Safeguarding/HR Officer Signature:

Date referred to Head of Safeguarding & Wellbeing:

**Action taken by Head of Safeguarding & Wellbeing:**

Report/referral made to...?

☐

LADO

☐

Police

☐

Premier League

☐

The FA

☐

School/Team

☐

Parents  
/Carers

☐

Other

If other please state:

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

Feedback given to...?

☐

Safeguarding  
Officer

☐

Safeguarding  
Board

☐

Club  
H.O.D

☐

Person who recorded  
Disclosure

☐

Victim

☐

Other

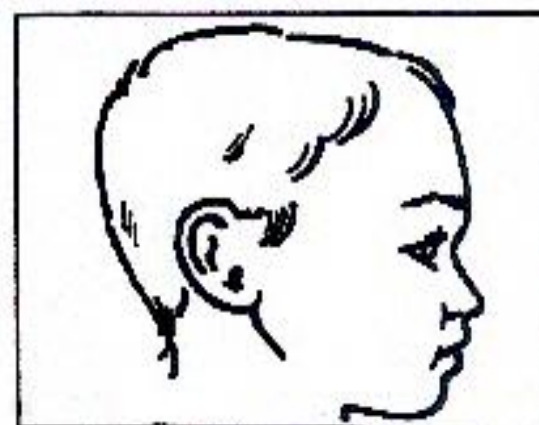
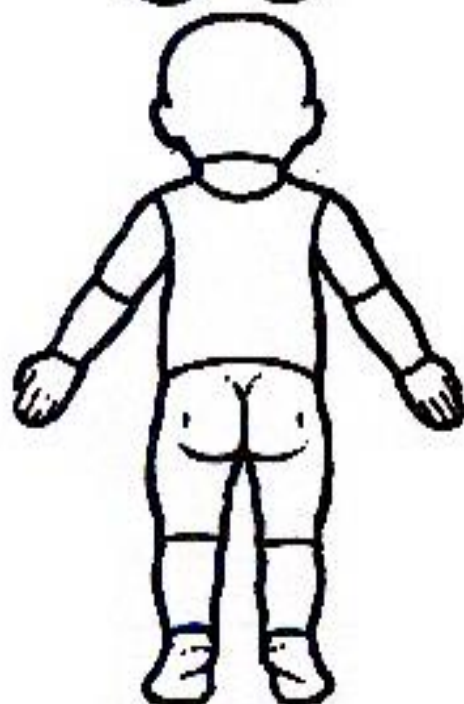
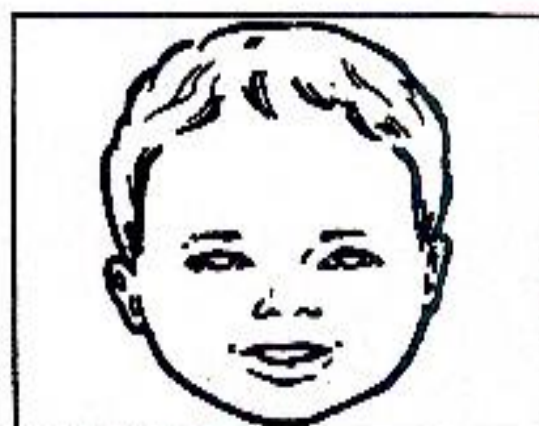
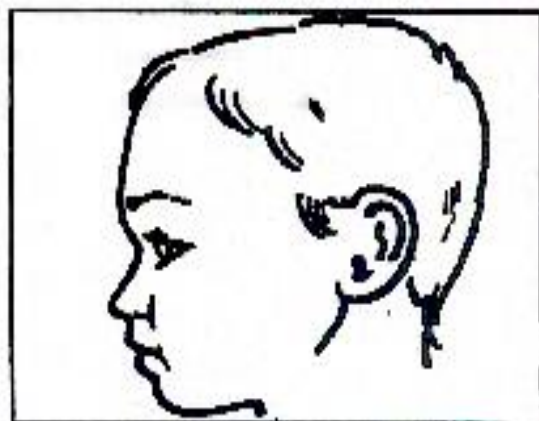
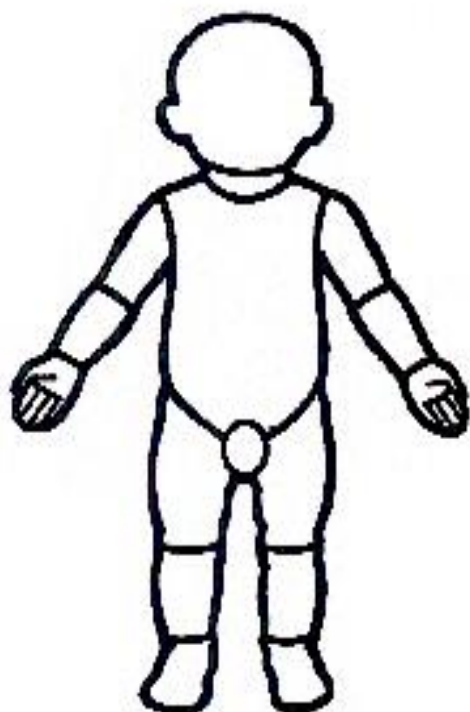
**Head of Safeguarding & Wellbeing Signature:**

**Date:**

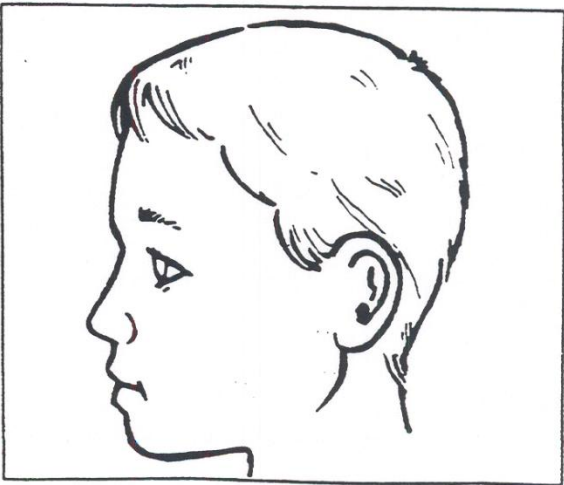
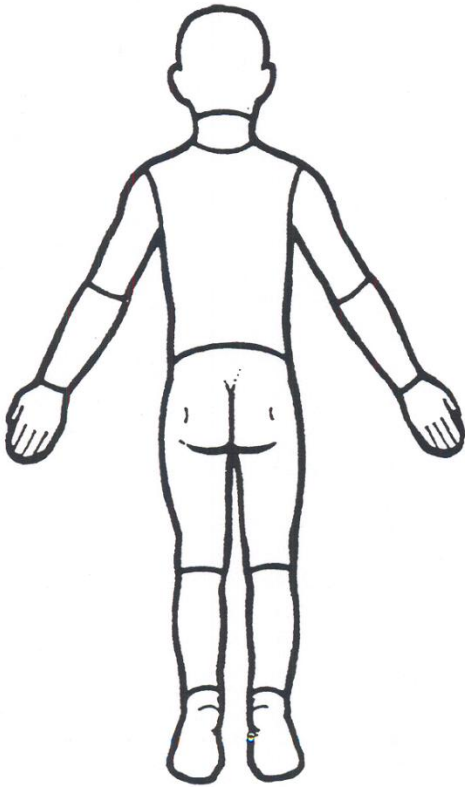
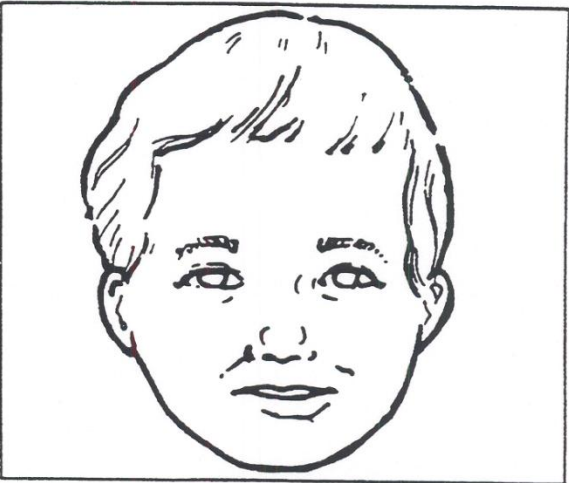
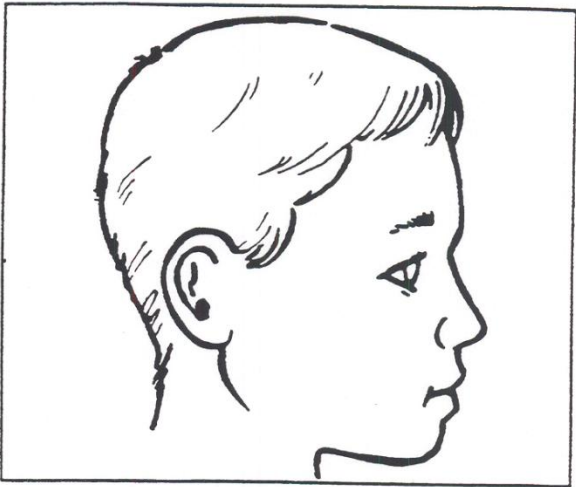
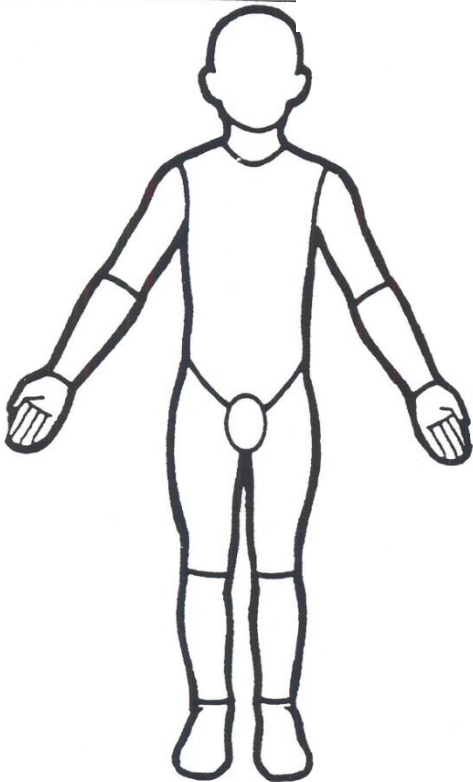
**Head of HR signature**

**Date:**

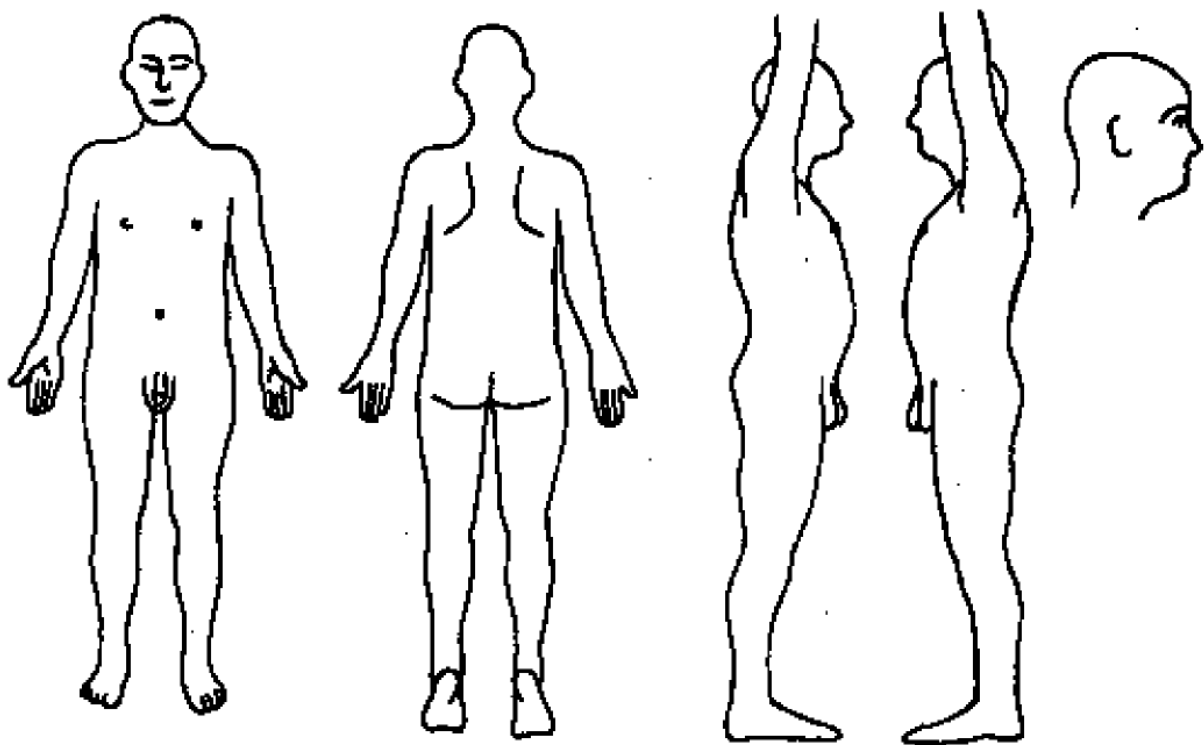
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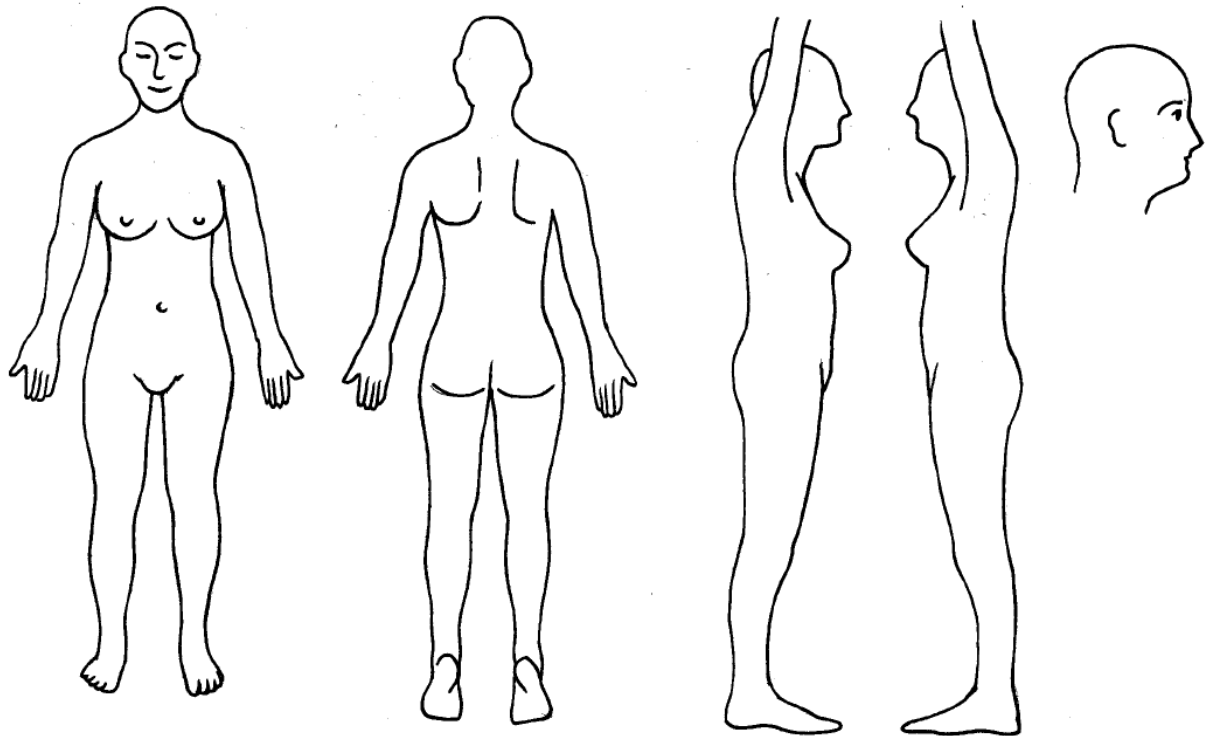
Older Child



**Adult Male**

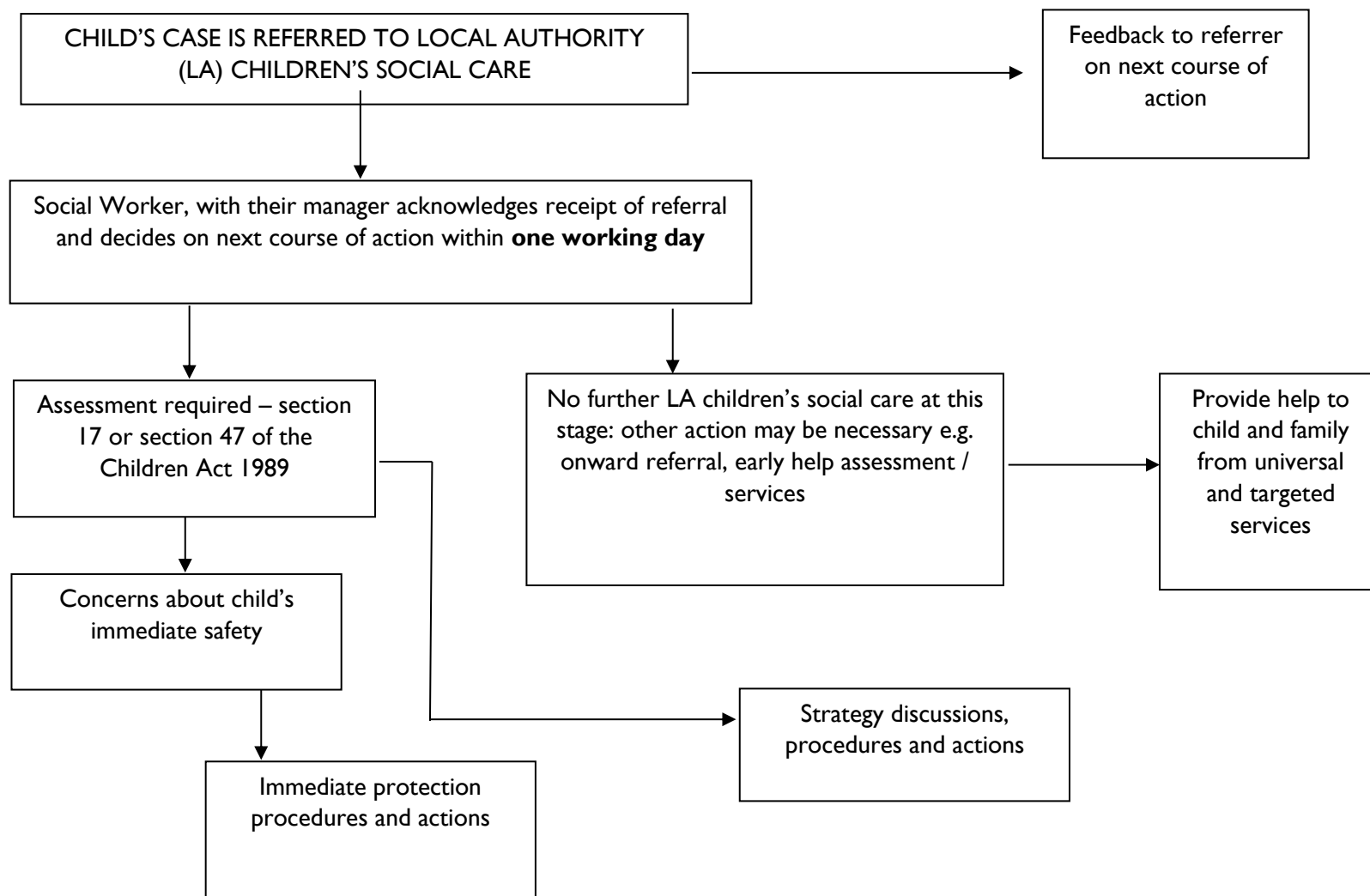


**Adult Female**



## Appendix D

### Action taken when a child is referred to local authority children's



## Appendix E

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

