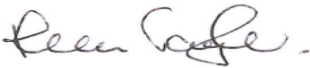




FGR Community - Safeguarding Adults at Risk Policy and Procedures

Policy prepared by:	Sarah Urquhart
Policy approved by Director for governance:	Helen Taylor
Signed by Director for governance:	
Became operational:	21.6.19
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Updated by and date:	Sarah Urquhart 3.12.20
Amendments:	As a result of attending L3 training added additional legislation.
Due for review	June 2021

Introduction

FGR Community is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in our Trust's activities and services in accordance with the Care Act 2014.

FGR Community will encourage and support partner organisations to adopt and demonstrate their commitment to the principles and practice of equality as set out in this policy and procedures.

This policy should be read in conjunction with all other policies:

- Equal Opportunities Policy
- Anti-harassment and Bullying Policy
- Anti-corruption and Bribery Policy
- Capability Procedure
- Disciplinary Rules
- Disciplinary Procedure
- Grievance Procedure
- Whistle-blowing Policy



- Health and Safety Policy
- Data Protection Policy
- Electronic Information and Communications Systems Policy
- Social Media
- Lone working policy

2.1 Principles

2.1 The guidance given in the policy and procedures is based on the following principles:

The six principles of adult safeguarding:

The Care Act sets out the following principles that should underpin safeguarding of adults
Empowerment - People being 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.

“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.

“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.

Communities have a part to play in preventing, detecting and reporting neglect and abuse

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.

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

2.1.2 All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.



2.1.3 FGR Community will seek to ensure that our activities are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.

2.1.4 The rights, dignity and worth of all adults will always be respected.

2.1.5 We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.

2.1.6 We recognise that a disabled adult may or may not identify themselves or be identified as an adult 'at risk'.

2.1.7 We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within our Club's activities for example inappropriate behaviour of a coach, or in the wider community.

2.1.8 All allegations will be taken seriously and responded to quickly in line with the Club's Safeguarding Adults Policy and Procedures.

2.1.9 FGR Community recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Boards.

3 Guidance and Legislation

3.1 The practices and procedures within this policy are based on the principles contained within the UK and legislation and Government Guidance and take the following into consideration:

- The Care Act 2014
- Criminal Justice Act 1988
- Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- Human Rights Act 1998
- Data Protection Act 2018
- Serious Crime Act 2015
- Care and Support Statutory Guidance (updated 12 February 2018)
- Counter terrorism and Security Act 2015
- Deprivation of Liberty Safeguards 2017
- Police & Criminal Evidence Act 1984
- Fraud Act 2006 Sec 4
- Multi-agency public protection arrangements (MAPPA)
- Multi-agency risk assessment conference (MARC)



4 Definitions

4.1 To assist working through and understanding this policy a number of key definitions need to be explained:

4.1.1 Adult at Risk of harm is a person aged 18 or over who has needs for care and support (whether or not the local authority is meeting those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example experiencing domestic violence. This list is not exhaustive. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

4.1.2 Abuse is a violation of an individual's human and civil rights by another person or persons. See section 5 for further explanation.

4.1.3 Adult is anyone aged 18 or over.

4.1.4 Adult safeguarding is protecting a person's right to live in safety, free from abuse and neglect.

4.1.5 Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).

5 Types of Abuse and Neglect - Definitions from the Care Act 2014

5.1 This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour or issue which could give rise to a safeguarding concern.

5.1.1 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. In football this could be a player whose appearance becomes unkempt, does not wear suitable sports kit and deterioration in hygiene.

5.1.2 Modern Slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. In football you may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.



5.1.3 Domestic Abuse – including psychological, physical, sexual, financial and emotional abuse. It also includes so called ‘honour’ based violence (see 5.2.2 below) and controlling and coercive behaviour which isolates, undermines and causes distress/harm. Sport may notice a power imbalance between a participant and a family member. For example, a participant with learning and communication differences may appear quiet and withdrawn when their brother comes to collect them from sessions, in contrast to their personal assistant whom they greet with a smile.

5.1.4 Discriminatory – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act 2010. This could be the harassing of an individual because they are or are perceived to be transgender

5.1.5 Organisational Abuse – including 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. In football, this could be training without a necessary break or not providing shelter.

5.1.6 Physical Abuse – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. This could be a coach intentionally striking a player or restraining a person during a session.

5.1.7 Sexual Abuse – 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 and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. This could be a fellow participant who sends unwanted sexually explicit text messages to an adult with a learning disability that they are training alongside.

5.1.8 Financial or Material Abuse – including 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, or the misuse or misappropriation of property, possessions or benefits. This could be someone taking personal belongings from a fan or participant with dementia.

5.1.9 Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. This could be a coach not ensuring players have access to water.

5.1.10 Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. This could be a participant threatening another player with physical harm and persistently blaming them for poor performance.

5.2 Not included in the Care Act 2014 but also relevant:



Cyber Bullying - cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

5.2.1 Honour based violence - 'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse. FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a female of any age about going on a long holiday during the summer vacation period. A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. The reporting of any concerns about either suspected forced marriage or FGM is mandatory.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

5.2.2 Mate Crime - a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

5.2.3 Radicalisation and extremism - the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media. Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups or activities.

The government defines extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and



tolerance of different faiths and beliefs' (HM Government Prevent Strategy). Many of those who have been subject to radicalisation are acknowledged to have been vulnerable as a result of social isolation, mental health issues, learning and communication difficulties or unstable social circumstances.

6. Signs and indicators of abuse and neglect

6.1 Abuse can take place in any context and by all manner of perpetrator. Abuse may be inflicted by anyone in the Trust who a participant comes into contact with. Club members, workers, volunteers or coaches may suspect that participant is being abused or neglected outside of the Club setting. There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

6.1.1 Unexplained bruises or injuries – or lack of medical attention when an injury is present.

6.1.2 Person has belongings or money going missing.

6.1.3 Person is not attending / no longer enjoying their sessions.

6.1.4 Someone losing or gaining weight / an unkempt appearance.

6.1.5 A change in the behaviour or confidence of a person.

6.1.6 They may self-harm.

6.1.7 They may have a fear of a particular group or individual.

6.1.8 They may tell you / another person they are being abused – i.e. a disclosure.

7 Partnership

The Trust always ensures external partners and organisations we engage with promote the safety and welfare of adults at risk and this is outlined in contracts and/or service level agreements. External partners and organisations are required to demonstrate competencies in safeguarding and the club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements, they will be expected to comply with the Trust's standards. In the event of working with an external partner it will be decided at the outset who will be lead organisation for Safeguarding, for example in the event of running a programme with a local council, FGR Community would follow the councils safeguarding policies and procedures. Our safeguarding policy will be available to these partners and available to the users/participants on our website.

8 Recruitment & Disclosure



As part of the Trust's recruitment and selection process, offers of work for positions which come into contact with adults at risk are subject to a satisfactory self-declaration and a criminal record check (CRB) as relevant, CV checks, appropriate references, right to work in the UK checks and a qualification check, if applicable.

All offers of work are subject to a satisfactory outcome to the rigorous screening process and until such time that all background checks are deemed as acceptable by the Trust, the person concerned is not permitted to commence work.

All employees, workers, consultants, agency staff and volunteers in a position of trust are required to undergo regular DBS disclosure clearances, normally every three years or earlier if required.

Should any person's DBS disclosures reveal any cautions, convictions, community resolutions, warnings or final reprimands the club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with adults at risk. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment is carried out to evaluate the information contained within the disclosure certificate.

The person may also be required to attend a risk assessment meeting with a Designated Safeguarding Officer (DSO) and/or a member of the club's Safeguarding Team prior to a recruitment decision being made.

All new employees, workers, consultants, agency staff and volunteers working with adults at risk at the club are required to complete a self-declaration on commencement of duties.

When the Trust uses suppliers or agencies to undertake its work, they are be subject to rigorous vetting and safeguarding checks and required to adhere to the Trust's policy and procedures as set out in their contracts or service level agreements where relevant.

When the club engages with organisations in connection with adults at risk related activities, where appropriate the Trust writes to the organisation to state the Trust's policy and procedures in relation to criminal record checks and safe recruitment.

The Trust only discloses the name, date of birth, disclosure and issue numbers of the employees, workers, consultants, agency staff or volunteers criminal record checks. Disclosure information in relation to checks will not be divulged.

Organisations are required to comply with the Trust's safeguarding arrangements as set out in contracts and/or service level agreements.

9 Induction and training

During the induction process, employees and directors who work with or come into contact with adults at risk are required to attend the parent club's safeguarding and protection introductory training within one month of starting their employment and where appropriate The FA Safeguarding Children workshop when deemed appropriate.



Depending on their role, induction and their skills audit they will be signposted to either Local Authority training or EFL Safeguarding workshops. All staff members will be expected to attend an annual update or specific training depending on training needs identified in their supervisions and appraisals. The Senior Safeguarding Lead will attend EFL Trust Board Level Training. Directors will receive specific safeguarding updates via the SSL. Any Directors training needs will be picked up in their induction and the skills audit.

Employees will also have access to and on request receive a copy of this Policy and Procedures as well as other club policies and are required to sign an acknowledgement that they have read and agree to abide by them.

Workers, consultants, agency staff and volunteers who have roles that work with or come into contact with children, young people and adults at risk may be required to undertake both parent club and The FA training.

They also have access to and on request can receive copies of the Trust's Safeguarding Policies and Procedures and are expected to read and abide by them as set out in their Agreements.

Refresher safeguarding training through the FA is provided every three years or earlier as required.

10 Roles and responsibilities

FGR Community has a comprehensive safeguarding structure which ensures the safety and welfare of all children and young people who engage with the club. The responsibility is outlined in each job description.

If there is a concern the first point of contact is safeguarding@fgr.co.uk and reported to the Trust Safeguarding Lead, and recorded on My Concern.

Director for FGR Community, named Senior Safeguarding Officer (SSO)

Responsible for all aspects of the Trust and to ensure that safeguarding is a key priority at Trust Level. Responsible for linking with the parent club to provide club-wide strategic leadership that assist the Trust to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups, communicating at Trust level. Please see role job description.

Contact: Helen Taylor helen.taylor@fgr.co.uk

Head of Safeguarding for FGR Community, named Designated Safeguarding Officer (DSO)

Responsible for the strategic and operational direction and embedding safeguarding across the Trust. The Head of Safeguarding is also the lead point of contact should safeguarding concerns arise and is the Lead Disclosure Officer.



Responsible for liaising with other safeguarding leads within the parent club and academy as well as being the point of contact should a concern arise amongst employees, workers, agency staff, consultants and volunteers.

Responsible for familiarising themselves with the Trust's policies and procedure and ensuring the safety and welfare of all children and young people. Please see role job description.

Contact: Sarah Urquhart sarah.urquhart@fgr.co.uk

Tel no: 07419333746

Deputy Designated Safeguarding Officer

This will be the role of the Community Outreach Coordinator and they will take up the responsibilities for recording, reporting and referring in the absence of the DSO. Please see role job description.

Contact: James Grady james.grady@fgr.co.uk

11 Good practice and code of conduct

Good practice and code of conduct

To ensure all adults at risk have the most positive and safe experience when engaging with the club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of allegations, abuse and neglect occurring): This list is not exhaustive:

- Listen carefully to adults at risk about his/her needs, wishes, ideas and concerns and take them seriously;
- Treat all children adults at risk equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Make the experience of the activity fun and enjoyable;
- Promote fairness, confront and deal with bullying;
- Maintain a safe and appropriate distance with adults at risk and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the adult at risk ;
- If adults at risk have to be supervised in changing rooms always ensure coaches etc. work in pairs;
- Request written consent if the club are required to transport adults at risk for any activities, events or significant travel arrangements e.g. overnight stays;



- Employees and workers should maintain their qualifications and professional development;
- A qualified first aider is in attendance or readily available;
- Maintain appropriate professional relationships with adults at risk, including only engaging with them online with prior approval and through the club's social media channels;
- On trips, ensure that adults should not enter an adult's at risk room unless there is a safety concern, in which case two adults should enter and should not invite children or young people into their rooms;
- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of adults at risk;

- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the club's vision and values and be an ambassador for those values;
- Ensure adults at risk adhere to his/her relevant Code of Conduct;
- Secure written consent for the club to administer emergency first aid or other medical treatment if the need arises;
- Encourage adults at risk to take responsibility for his/her own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the club's Accident and Incident Report Form;
- When working in partnership with other organisations, familiarise yourself with their safeguarding policies and procedures and agree the lead organisation;
- Draw up an SLA with partner organisation.

Recording safeguarding concerns directly onto My Concern or if this is not possible due to a remote location on the Safeguarding Concern Form (Appendix 6)

12 Unacceptable practice

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers. This list is not exhaustive:

- Unnecessarily spending excessive amounts of time individually with a child or young person or vulnerable adult away from others;
- Being alone in changing rooms, toilet facilities or showers used by adults at risk;
- Taking adults at risk alone in a car or journey unless a club pool car is used, and written consent is sought from the club's Safeguarding Team for emergency situations;
- Taking adults at risk to your home or places where they will be alone with you;
- Sharing a room with adults at risk;



- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Allowing adults at risk to use inappropriate language unchallenged;
- Making sexually suggestive comments to adults at risk, even in fun;
- Reducing adults at risk to tears as a form of control;
- Allowing allegations made by adults at risk to go unchallenged, un-recorded or not acted upon;
- Doing things of a personal nature that adults at risk can do for them-selves.
- Not recording safeguarding concerns on My Concern or the Safeguarding Concern Form (SCF);
- Sending inappropriate text messages or social media messages to adults at risk;
- Having adults at risk engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram;
- Engaging with adults at risk on 'one to one' personal electronic communications;

13 Risk Assessments

For all Trust activities including, trips, tours, events and activities, thorough risk assessments are completed to identify and minimise potential risks. The Trust's Health and Safety Policy outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the Trust learns from such matters.

Where an adult at risk is involved in a trip, activity or event, a risk assessment must take account of his/her particular vulnerabilities whilst in the Trusts care. The risk assessment will set out what arrangements are in place for his/her care and supervision and how risks will be minimised.

Activity leaders will be required to continually monitor and amend the controls within the risk assessments whilst leading such activities.

14 Referrals

If the Trust has safeguarding concerns in relation to an Adult at Risk, the Trust may refer these concerns to external agencies. External agencies include, but are not limited to adult social care, the police, health agencies, the FA and the English Football League.

Follow the arrangements in the SLA if present.

15 Confidentiality



Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need to know basis only which would not normally include anyone other than the following:

- The Safeguarding Team;
- The person raising the concern;
- The employee, worker, consultant, agency staff or volunteer who received the concern or disclosure;
- The family of the adult at risk who is alleged to have been abused, where appropriate;
- Local Authority and Police;
- Dependent on role, the National Governing Body
- Employees, workers, consultants, agency staff and volunteers may have access to confidential information about adults at risk in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information.

Confidential or personal information about an adult at risk or his/her family should not be used for their own or others advantage.

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

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

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, guidance should be sought from the Trusts DSO.

The storing and processing of personal information about adults at risk is governed by the Data Protection Act 2018.

16 Information sharing

The Trust abides by the 7 guiding principles as set out by HM Government on sharing information:

The Data Protection Act 2018 and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about children and young people at risk is shared appropriately;



- Openness and honesty with the adult at risk (and/or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek agreement, unless it is unsafe or inappropriate to do so;
- Advice is sought from the Trusts DSO if there is any doubt about sharing the information concerned, without disclosing the identity of the adult at risk where possible;
- Information is shared with informed consent where appropriate and, where possible, there is respect for the wishes of those who do not consent to share confidential information. Information will still be shared without consent if, in the Trust's judgement, there is good reason to do so, such as where safety may be at risk. Judgement will be based on the facts of the case;
- Safety and well-being of the adult at risk is always considered;
- Information is only shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure to do so;
- Follow the agreements as outlined in the SLA.

Records of the Trusts decision to share information in relation to any reported concerns, with whom and the reasons are always recorded on My Concern or on the Safeguarding Concern Form Appendix 6

The Trust will share information with the relevant statutory agencies, the English Football League and FA where appropriate in relation to safeguarding cases.

17 Procedure for Review

FGR Community shall review this Policy and Procedures at the end of every season or whenever there is a change in legislation, guidance or governing body rules. It will be reviewed when there is any learning from safeguarding cases and when starting new projects and programmes. If there any significant organisational change, including changes in staff or programmes this policy will be reviewed. Any changes will be signed off by the Directors.

18 Consent

The priority in safeguarding should always be to ensure the safety and welfare of the adult at risk. If concerns arise, it is best practice to always gain the consent of the child or young person before an external referral is made. There are several circumstances whereby an external referral can be made without consent and these include:

- The adult at risk is at risk of harm;
- Other people are, or may be, at risk, including other children or young people;
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent;



- Sharing the information could prevent a serious crime;
- The adult at risk lacks the mental capacity to make that decision;
- A serious crime has been committed;
- There is a risk of significant harm and meets the threshold for a multi-agency strategy meeting;
- Employees, workers, consultants, agency staff or volunteers are implicated;

What to do if you suspect abuse or poor practice has occurred?

If you are concerned about the safety or welfare of an adult at risk or you are concerned about an adult's behaviour towards an adult at risk, you must act. Do not assume that some-one else will help the child or young person. Safeguarding adults at risk is everyone's responsibility.

It is important that you report your concerns to one of the following:

- Designated Safeguarding Officer, FGR Community
- Senior Safeguarding Manager, Chief Executive Officer, FGR in the Community

Taking no action is not an option.

What to do if you receive a safeguarding disclosure from a adult at risk

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

Stage 1

Deal with the disclosure as it happens and ensure that the adult at risks immediate needs are met and that he/she feels supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy and Procedure, even if the validity of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; you are however expected to act in the best interest of the child or young person who may be at risk.

You must:

- Put your own feelings aside and listen as if the information is not sensational;
- Allow the person to lead the discussion and to talk freely;
- Listen to what the person is saying without investigating. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated;
- Allow the person to tell you at his/her own pace;



- Don't worry if the person stops talking for a while, silences are ok. You don't have to rush in to fill the gaps;
- Accept what the person says without challenge;
- Allow the person to talk but protect him/her from sharing the information with too many other people;
- Provide reassurance that you are taking them seriously and he/she have done the right thing by disclosing;
- Let the person know it is recognised how hard it is for him/her to tell you;
- It is ok to let him/her know if you are unable to answer all their questions;
- Avoid asking leading questions, for example "Did the coach hit you?"
- Never ask questions that may make the person feel guilty or inadequate;
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a person to remove or adjust his/her clothing to observe them and do not take photo-graphs of the injuries, you should make a note of the injuries on the Body Map in the Safeguarding Concern Form Appendix 6

Tell the person who you will be contacting e.g. FGR Community DSO and that you will support him/her through that process;

- If you establish that they he/she has been harmed or is at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure;
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting adults at risk.

You must not:

- Panic or show that you are shocked. It is important to remain calm and in control of your feelings;
- Document the conversation while the person is disclosing. This should be done as soon as possible after the person has disclosed to you;
- After the person has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the person to describe what happened to him/her; Investigate;
- Give the impression that you might blame the person e.g. don't ask: "Why did you let him?", "What were you doing there anyway?" or "Why didn't you tell me before?"
- Press for details by asking questions such as "What did he/she do next?"
- Ask leading questions;
- Pass judgement on what is said;



- Make false promises and/or promise confidentiality – it should be explained that the child/young person has done the right thing, outline who will need to be told and why;
- Approach the alleged abuser yourself.
- Do remember, when a person discloses they may feel:
 - Guilt: he/she may blame themselves for the abuse and often feel guilt for telling.
 - Ashamed: he/she may feel ashamed about the abuse itself.
 - Confused: he/she may be confused about his/her feelings for the alleged abuser.
 - Scared: he/she may be fearful of the repercussions of telling. He/she may be scared of the alleged abuser.
- Be careful about touching (e.g. hugging or cuddling) the person if they have not initiated the contact. He/she may be upset by physical contact.

Stage 2

As soon as possible, once the immediate comfort and safety of the person is secured, you must inform your DSO, or the Senior Safeguarding Officer of the disclosure. You may make a referral yourself directly to a statutory agency if you are concerned about the adult at risks' immediate safety and/or are having difficulty contacting the designated safeguarding person/s or if the designated safeguarding person is the alleged abuser. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

Stage 3

You should complete the concern on My Concern or on the Trust's Safeguarding Concern Form (SCF) as soon as possible after the disclosure has been made and if using a paper form, send the SCF Appendix 6 to the Safeguarding Team within 24 hours of the disclosure. Wherever possible, you must record information as it was relayed to you using the language of the adult at risk rather than your own interpretation of it.

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Trust's DSO what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out. If you have concerns that the disclosure has not been acted upon appropriately, you should inform the Trust's SSO and then the People Team and ultimately contact the relevant statutory agency.

A disclosure is not the only way that you may be made aware of an issue. Sometimes another adult or even an adult at risk may say something about a possible abusive situation. On occasions you may witness an incident that may cause concern or indeed you may pick up on things that cause concern or information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason.



Raising a concern

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

Step 1

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

Step 2

If you feel unable to raise the matter with the DSO for whatever reason, raise the matter with the SSO.

Step 3

If you feel the SSO has not handled the concern appropriately you should contact the club's People Team.

Step 4

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, you should contact:

Hugh Feltham, County Welfare Officer at Gloucestershire FA using 01454 615888 option 4 or email Support@GloucestershireFA.com

For a flowchart of the process to follow, please see Appendices 3, 4 and 5

Managing allegations against employees, workers, consultant's, agency staff and volunteers

Should a concern arise about an employee, worker, consultant, agency staff or volunteer's conduct in relation to a child or young person, this should be reported to the Trust's DSO who will take such steps as considered necessary to ensure the safety of the person in question and any other person who may be at risk.

The person raising the concern should complete a concern on My Concern or on the Trust's Safeguarding Concern Form Appendix 6

When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Per-son at the Local Authority and/or the Police;
- The adult at risk will be contacted as soon as possible, following advice from statutory agencies;

Managing allegations against employees, workers, consultant's, agency staff and volunteers

Should a concern arise about an employee, worker, consultant, agency staff or volunteer's conduct in relation to an adult at risk, this should be reported to the Trust's DSO who will take such steps as considered necessary to ensure the safety of the person in question and any other person who may be at risk. The person raising the concern should complete a concern on My Concern or the Trust's Safeguarding Concern Form Appendix 6



When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Person at the Local Authority and/or the Police;
- The family will be contacted as soon as possible, following advice from statutory agencies;
- Senior Management will be notified and if applicable the English Football League and the FA;
- If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the who will refer the allegation to the appropriate statutory agencies;
- If required, a full investigation and possible sanction in accordance with the club's Disciplinary Policy for employees will follow. Workers, consultants or agency workers may have their Agreements terminated.
- Referrals as appropriate will be made to the Disclosure and Barring Service (DBS)

These procedures cover handling allegations made against a member of staff or volunteer, as well as against one made by a participant.

For a flowchart of the process to follow, please see Appendix 3, 4 and 5

Making a referral

All employees, workers, consultants, agency staff and volunteers should complete the trusts Safeguarding Concern Form (Appendix 8) after referring any case to the DSO and/or SSO. The Safeguarding Team will contact the relevant Local Authority Adult Services Team completing their Referral Form and update the records on My Concern.



Appendix 1

Allegations against employees, workers, consultants, agency staff and volunteers

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

Is the concern about a member of the Safeguarding team?

Yes

No

Inform the Senior Safeguarding Manager (SSO) immediately and the person raising the concern should complete the concern on My Concern or use the Safeguarding Concern Forms (SCF) as soon after the incident and send to the (SSO) within 24 hours.

ST or SSO (If allegation is against a member of the ST) decides whether the employee, worker, consultant, agency staff or volunteer has:

- Behaved in a way that has harmed or may have harmed a child, young person or adult at risk
- Possibly committed a criminal offence in relation to a child, young person or adult at risk
 - Behaved towards children, young people or adults at risk in a way that indicated he/she is unsuitable to work with children, young people or adults at risk

ST or SSO completes the relevant sections on My Concern or of the SCF.

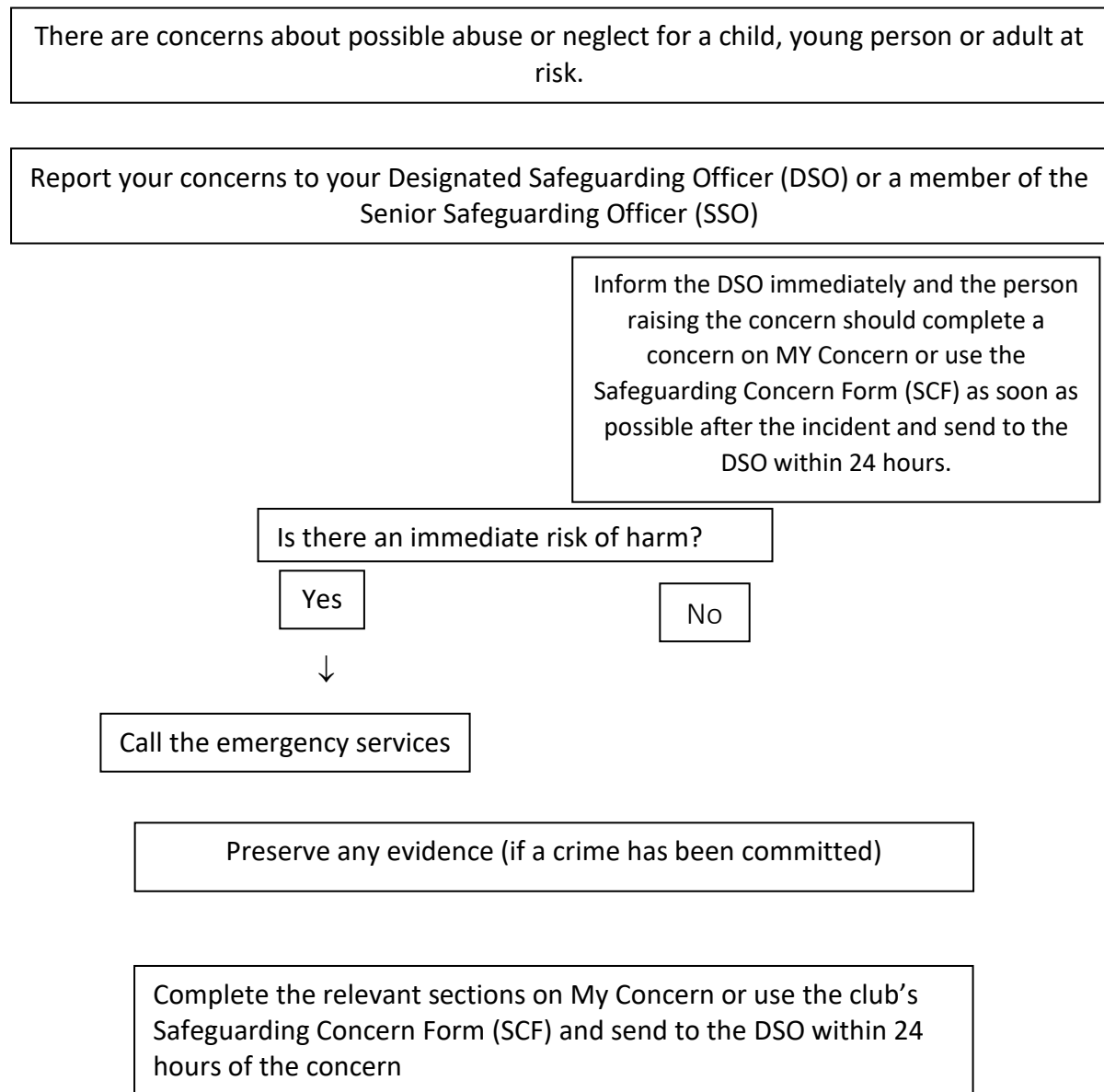
ST or SSO contact the Local Authority Designated Officer (LADO) and/or the police for advice, The ST, SSO and the People Team will act on the advice of the LADO and/or police. The Trust will inform the EFL Trust and the The FA and relevant internal colleagues including, Board of Directors and CEO if appropriate.

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



Appendix 2

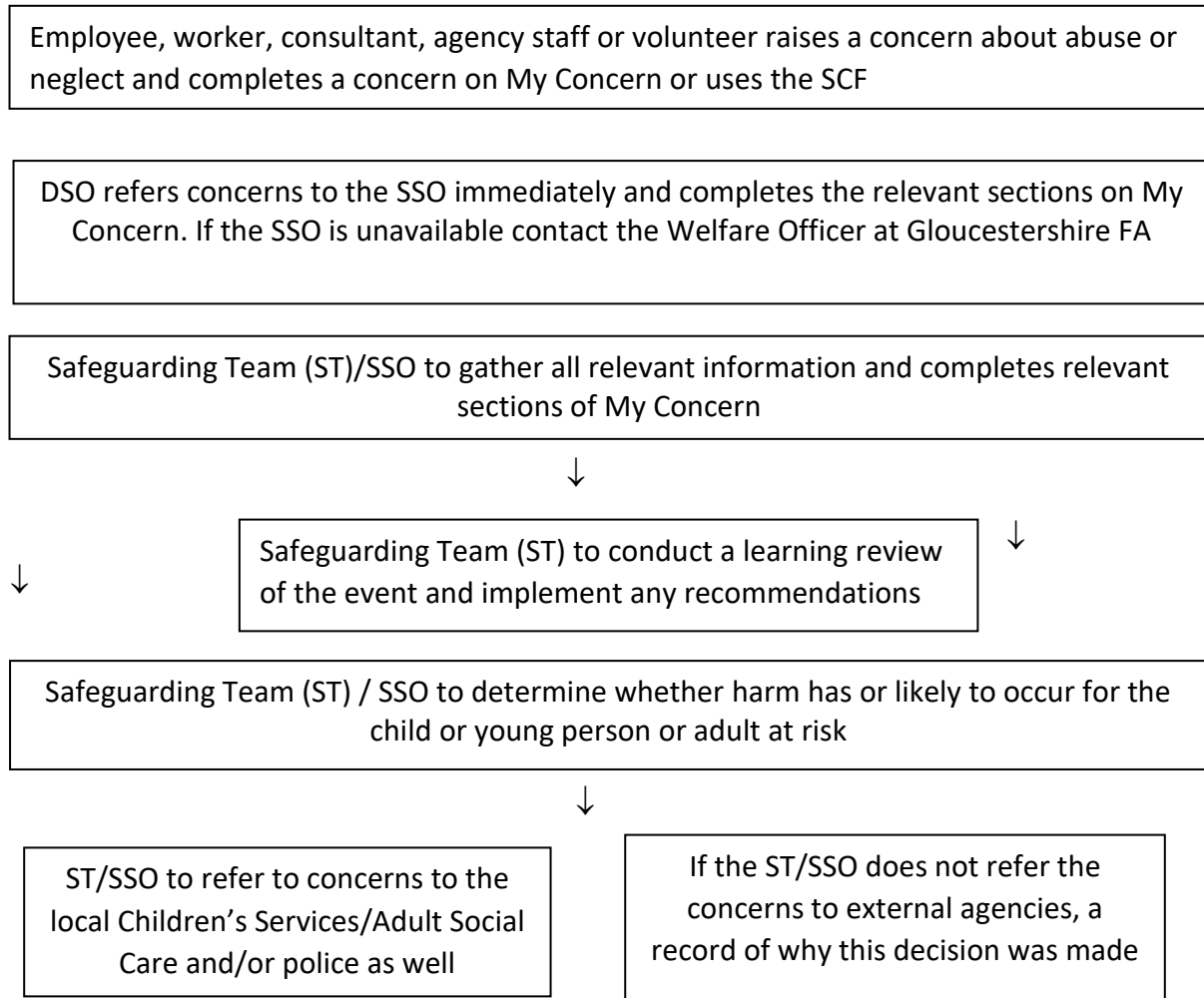
Flowchart for employees, workers, consultants, agency staff and volunteers who raise concerns about a child or young person or adult





Appendix 3

Flowchart for DSO and SSO making a referral



Appendix 4



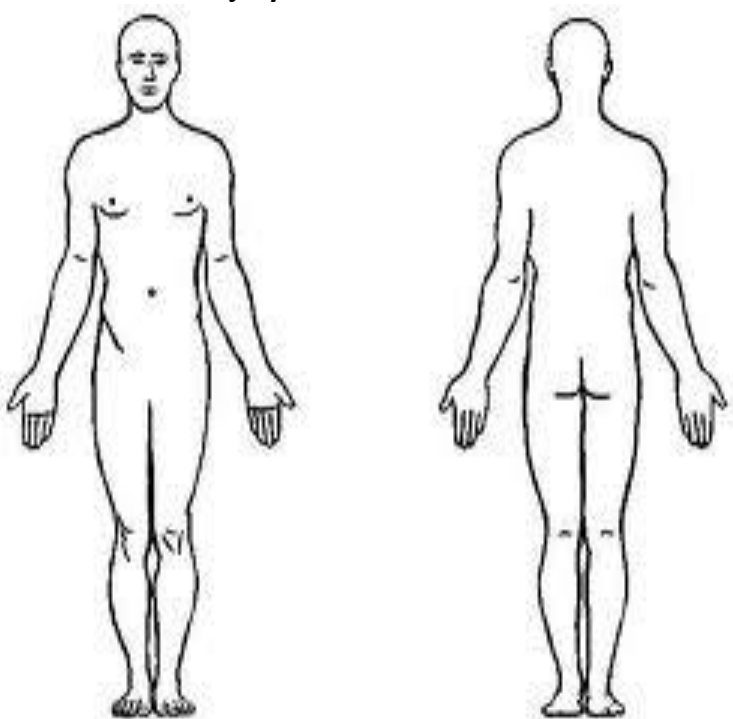
Safeguarding concern form, to be used if you cannot access My Concern.

Safeguarding Concern Form	
Private and confidential once complete	
<p>Please complete sections A-H of this form as fully as possible after witnessing a safeguarding incident or if one has been reported to you. Where possible, you should always seek consent of the child/young person at risk before sharing the information. If you are not sure whether you have consent, please contact the Safeguarding team on the numbers below. If there are concerns raised about a club employee, worker, consultant, agency staff or volunteer you should not inform them that a safeguarding allegation has been made until you have sought the advice of the Safeguarding Team. If a person has literacy issues or additional needs and is unable to complete the form, you can complete the form on their behalf but must disclose this in Section F. Please complete the form within 24 hours of disclosure and in black ink and return to safeguarding@fgr.co.uk.</p>	
Section A – Your details	
Full name	
Your role at the Trust (if applicable)	
Contact number	
Email address	
Date and time of safeguarding concern	/ / Time:
Date and time of the safeguarding concern form completion	/ / Time:
Section B – Child or young person or adult at risk details (the child or young person at risk who is potentially at harm)	
Child or young person or adult at risk's name	
Age of child or young person or adult at risk	
Date of birth	
Address	
	Postcode:
Telephone number	
Section C – Alleged person to have caused the concern	
Name of the alleged person to have caused the concern	
Address	
Age of the alleged person	
Section D – Confidentiality	
Has the child or young person or adult at risk given consent to share the information?	Yes No If not, please state why:
Section E – Your concerns	



Facts (Please state facts. For example, the person said to me “I was too scared to go home today” and/or the child/young person/adult at risk had a bruise on their right hand – Please link any injuries to the body map attached – see Section G)																	
Describe what happened (People, place, time, context, what was observed)																	
Professional opinions (Please state what is your opinion is the concern). For example, I believe in my position as the Strength & Conditioning Coach/Steward that the child(ren), young person or adult at risk is being groomed online through social media.																	
Hearsay/witnesses (Please state what has been said by others or overheard regarding an incident). For example, you overheard the child(ren), or young person at risk talking to their friend saying they are scared about going home/school/football because of being bullied etc.																	
Section F: Actions																	
What actions did you take? (What did you do, i.e who have you told, did you move the child or young person at risk to a safe place?)																	
Have the family or parents/carers of the child or young person or adult at risk have been informed of the concern? (If you feel that informing the parent or carers about the concern will put the child or young person at risk, you should not inform the parent/carer but need to document here why you feel it would put them at risk)	<table border="0"> <tr> <td>Yes</td> <td></td> <td>No</td> <td></td> </tr> <tr> <td colspan="4">If not, please state why?</td> </tr> <tr> <td>Yes</td> <td>No</td> <td colspan="2">N/A</td> </tr> <tr> <td colspan="4">If no please state why:</td> </tr> </table>	Yes		No		If not, please state why?				Yes	No	N/A		If no please state why:			
Yes		No															
If not, please state why?																	
Yes	No	N/A															
If no please state why:																	
Date and time parents/carers were informed of the concern	<div style="text-align: center;"> / / Time: : </div>																
Parent/carers response (please state facts)																	



Have parents/carers given consent to share the information	Yes	No
Parent/carers address	Postcode:	
List the name and contact details of any witnesses to the concern:	Name: Name: Name:	Contact details: Contact details: Contact details:
Section G: Acknowledgement All information recorded on the Safeguarding Concern Forms is accurate to my knowledge		
Sign & date	/ /	
If completing on behalf of another person, please ensure they sign above, and you provide your name and contact details		
Section H: Body Map (If applicable)		
Record any physical injuries or marks that you notice on the body map. Place a mark where the injury is and then a line out to a written number. Write a corresponding description of the nature of the injury in section I.		
		
Section I: Body map injury description		
Write a corresponding description of the nature of any injury annotated in section H. Care should be given to state: - Specific location (right elbow)		



<ul style="list-style-type: none">- Description of the injury (colour of the bruise, bleeding, scabbing, shape etc)- Approximate size of the injury by relating to standardised objects- Sign name- Date <p>Example: Open wound above right eye which was bleeding, approximate size of a 10p coin. Steve Smith. 01/07/2017</p>	
Injury description 1:	
Injury description 2:	
Injury description 3:	
Injury description 4:	
Injury description 5:	
Injury description 6:	
Injury description 7:	
Section J: What next	
Please ensure that the completed form is returned to safeguarding@fgr.co.uk within 24 hours of the concern being raised.	



Helpful numbers

Designated Safeguarding Officer, FGR Community

Sarah Urquhart
01453 837 431/07419333746

Gloucestershire Safeguarding Adults Board

gsab@gloucestershire.gov.uk
Gloucestershire LADO – 44 (0)1452 426868

Gloucestershire Domestic Abuse

0845 602 9035
<https://www.gdass.org.uk/>

Gloucestershire healthy living and learning

<https://www.ghll.org.uk/>
01452 427208