



ADULTS AT RISK SAFEGUARDING POLICY AND PROCEDURES

Brighton & Hove Albion FC / Brighton & Hove Albion Women's FC / BHAFC Foundation

Updated March 2026

FOREWORD

The Adult Safeguarding Policy and Procedure reflects Brighton and Hove Albion Football Club's commitment to ensuring the safeguarding and protection of adults.

This Policy is supported by all senior managers and has been approved by the BHAFC board of directors, the BHAWFC board of directors and the BHAFC Foundation board.



APPLICATION OF POLICY

Where the Policy refers to the 'Club', this encompasses Brighton & Hove Albion Football Club (BHAFC), Brighton & Hove Albion Women's Football Club (BHAWFC) and Brighton & Hove Albion Foundation (BHAFC Foundation).

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PURPOSE AND AIMS

The Club is committed to safeguarding and ensuring the protection of adults at risk and recognises its moral and legal responsibility to do so. Our aim is to ensure that best practice safeguarding procedures are embedded in every element of the Club's work to ensure the welfare and well-being of all adults at risk who engage in activities with the Club.

All individuals within the Club have a role and responsibility to help ensure the safety and welfare of all adults.

The Club accepts that we are required to fulfil our duty of care, which means that we must do everything that can be reasonably expected of us to help safeguard and protect people from harm, and to act when we suspect that someone is being harmed or is at risk of harm.

This policy is informed by the following legislation and guidance:

- Care Act 2014
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- Equality Act 2010
- FA Safeguarding, Premier League and Premier League Foundation Rules and guidance



SCOPE

This policy applies to all those working on behalf of the Club, including permanent, casual, volunteers and contractors regardless of their role.

All the requirements are mandatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse.

Activities undertaken by Club departments at the following locations fall under the remit of this policy (this list is not exhaustive):

AMERICAN EXPRESS STADIUM

- Men's first team and Academy fixtures
- Women's first team and Academy fixtures
- Stewarding and all other matchday activities
- Stadium tours, children's birthday parties
- Stadium Superstore
- Junior fans activities
- BHAFC Foundation programmes and activities

THE AMERICAN EXPRESS ELITE FOOTBALL PERFORMANCE CENTRE AND OTHER VENUES:

- Men's first team training, Academy matches, training and development centres
- Women's first team training, Academy matches, training and development centres
- Educational provision
- All medical provision for children and young people under 18 years
- Academy Host Family provision
- BHAFC Foundation programmes and activities

BROADFIELD STADIUM, CRAWLEY

- Women's First Team, Academy fixtures and Under-21 DS fixtures
- BHAFC Under-21 fixtures
- BHAFC Foundation programmes and activities

FRESHFIELD ROAD OFFICES AND COMMUNITY HUB

- BHAFC Foundation programmes and activities

WHAT IS ADULT SAFEGUARDING?

The official definition of “Adult safeguarding” is working with adults with care and support needs to keep them safe from abuse or neglect. It is an important part of what many public services do, and a key responsibility of local authorities (Care Act 2014).

THE SAFEGUARDING DUTIES APPLY TO AN ADULT WHO:

- Has needs for care and support (whether or not the local authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect
- Is unable to protect themselves from either the risk of, or the experience of, abuse or neglect, as a result of those care and support needs

Adults who fulfil these criteria are ‘adults at risk’.

People can have a need for care and support for a variety of reasons – for example they may have a learning disability, a physical disability, a chronic health condition or have a mental health issue. Such conditions may bring with them additional vulnerabilities, however having care and support needs does not mean that people are automatically adults at risk and need safeguarding.

SAFEGUARDING ADULTS IS UNDERPINNED BY:

- The Care Act 2014
- Mental Capacity Act (MCA) 2005

TYPES OF ABUSE SUFFERED BY ADULTS IDENTIFIED IN THE CARE ACT 2014 ARE:

- Physical
- Sexual
- Psychological/Emotional/Mental
- Financial and material
- Neglect and act of omission
- Discriminatory
- Organisational
- Modern Day Slavery
- Domestic Violence
- Self-neglect – including hoarding

OTHER TYPES OF HARM THAT ADULTS MAY EXPERIENCE INCLUDE:

- Cyber Bullying
- Forced Marriage
- Female Genital Mutilation
- Mate Crime
- Radicalisation

EDI STATEMENT

We believe the safety and well-being of all adults and young people is of the utmost importance and that they have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

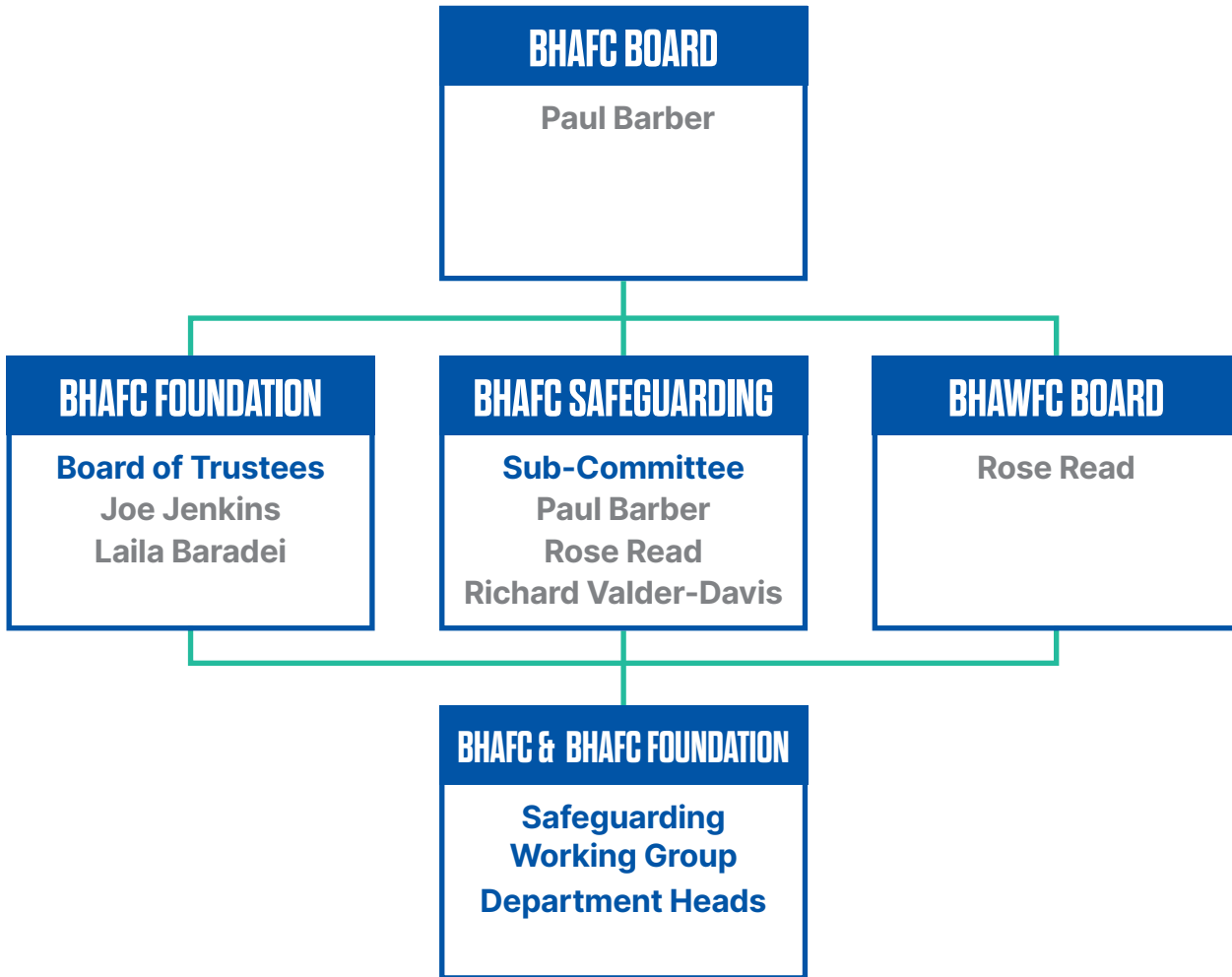
We will:

- Ensure our services are underpinned by equity of opportunity
- Acknowledge, promote, and celebrate the value of diversity
- Ensure that issues of equality and diversity are considered across the safeguarding function
- Challenge any unlawful discrimination, harassment and victimisation
- Ensure that we have impactful training in place to educate and inform staff around their responsibilities and duties in relation to issues of equality and diversity



SAFEGUARDING FRAMEWORK

The Club implements a comprehensive framework to ensure the safety and welfare of adults. All employees of the Club have a responsibility to promote the safety and welfare of adults. However, there are specific roles and specified duties in relation to safeguarding, which are set out below:



ROLES AND RESPONSIBILITIES



Paul Barber – Deputy Chairman and Chief Executive Officer

Senior Safeguarding Lead

Paul Barber is the Senior Safeguarding Lead for the Club. As the Senior Safeguarding Lead, Paul is responsible for developing, leading and championing the Safeguarding Framework and overseeing its implementation, ensuring safeguarding is embedded into the Club culture and integrated into all aspects of governance and decision making.



Rose Read – Head of People & Culture

Senior Designated Safeguarding Officer

As Senior Designated Safeguarding Officer (Senior DSO), Rose plays a critical role in fostering a safe and supportive environment, ensuring that Safeguarding is embedded into all people related practices that prioritise the wellbeing and protection of participants and cultivate a culture where safety, inclusivity and respect are at the forefront. Working together with the Senior Safeguarding Lead to align working practices, ensuring compliance with legal and ethical standards.



Joe Jenkins – Foundation Chief Executive Officer

Senior Designated Safeguarding Officer BHAFC Foundation

Joe Jenkins, is the BHAFC Foundation Senior Designated Safeguarding Officer (Senior DSO) responsible for ensuring that safeguarding is prioritised across our charitable programmes including after school clubs and outreach initiatives. This includes overseeing the implementation of safeguarding policies, ensuring compliance with legal and ethical standards, fostering a culture of safety and inclusion and working closely with stakeholders to ensure vulnerable individuals are protected in all the Foundations activities.



Richard Valder-Davis – Head of Safeguarding and Academy Player Care

Senior Safeguarding Manager

Richard is responsible for developing and implementing safeguarding policies, ensuring compliance with safeguarding standards and practices, identifying and addressing risks, overseeing player welfare and ensuring all staff are trained and equipped to provide a safe environment for all. Richard also heads up our dedicated Safeguarding team, leading our Designated Safeguarding Officers (DSO's) who together are responsible for ensuring the effective delivery of safeguarding practices across the Club, supporting the leadership team in meeting their legal and ethical obligations.

ROLES AND RESPONSIBILITIES

Designated Safeguarding Officers (DSO)

There is a DSO within each area of the Club. Their role is to provide support and refer all issues upwards to the Head of Safeguarding and Senior Designated Safeguarding Officers. The relevant DSO will most often be your first point of contact for any safeguarding concerns or disclosures that arise. Where appropriate, the DSO will make the necessary referrals to the relevant statutory agencies, The FA Case Management Unit and/or the Premier League Safeguarding Team.

The DSOs at the Club are:



Rose Reed



Joe Jenkins



Rebecca Waller



Adrian Morris

- The Senior DSO for BHAFC is Rose Read
- The Senior DSO for BHAFC Foundation is Matt Dorn
- The DSO for the Elite Performance Centre incorporating the Boys and Girls academies is Rebecca Waller
- The DSO for BHAFC Foundation is Lynsey Hermann
- The DSO for matchdays is Adrian Morris

The BHAFC Foundation Board of Trustees

The BHAFC Foundation board of trustees is collectively responsible for leadership and oversight of safeguarding at the BHAFC Foundation.

Safeguarding Trustee

BHAFC Foundation has a dedicated Safeguarding Trustee. This role is to provide BHAFC Foundation robust safeguarding governance and be a critical friend to the charity.

Safeguarding Board Member

BHAFC has a dedicated Safeguarding board member who is responsible for oversight of safeguarding within the Women's & Girls area of the Club.

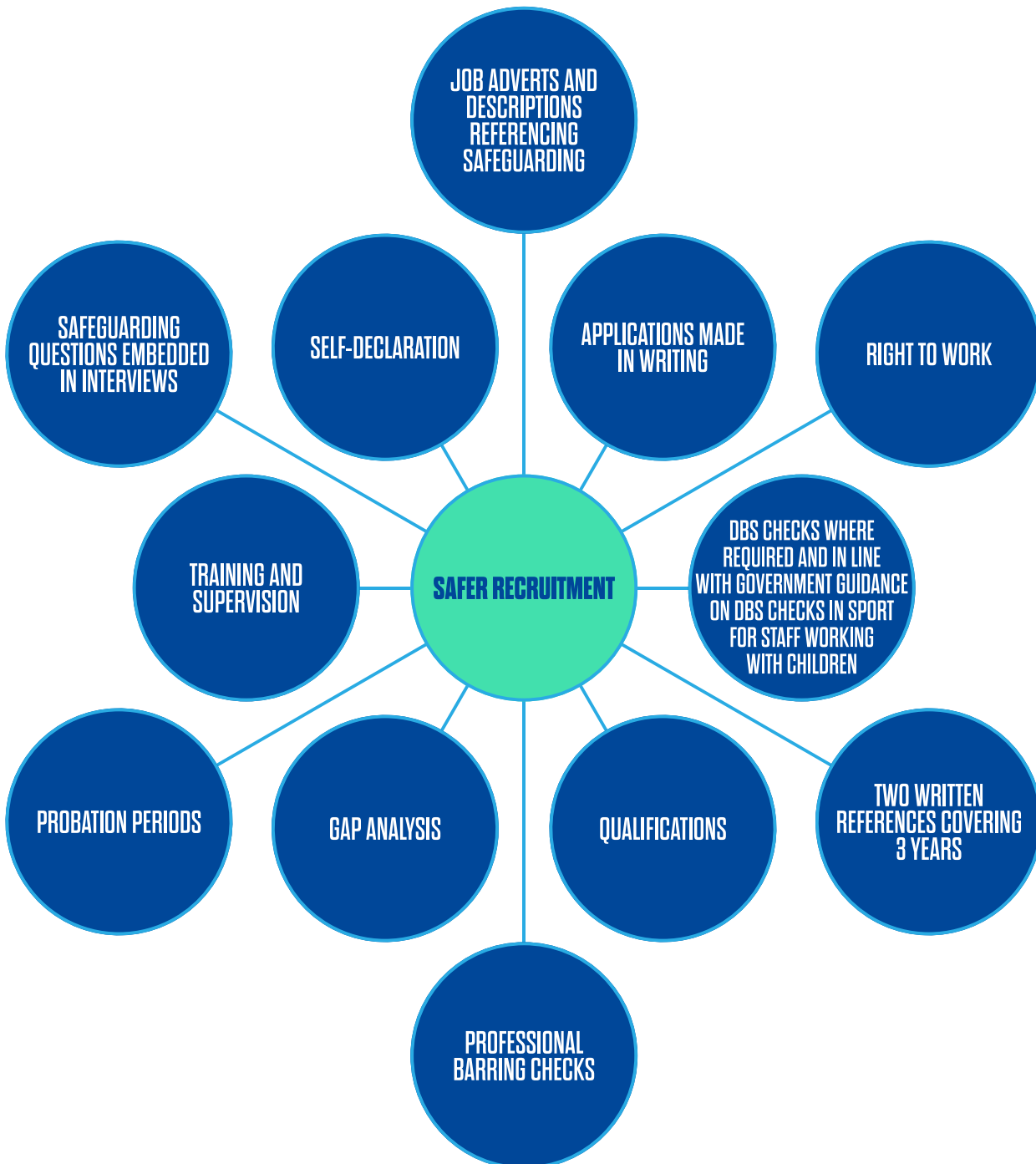
SAFER RECRUITMENT AND SAFEGUARDING TRAINING

The Club recognises the importance of safer recruitment and has taken into account The FA's Responsible Recruitment guidelines to ensure there is a safe and responsible recruitment process for all individuals within the club who come into contact with adults at risk. This applies to both paid or voluntary capacity.

The Club has a duty to carry out due diligence that any third parties working with children or adults at risk on behalf of the Club, including but not limited to teachers, interpreters and mental health professionals will also have completed a safer recruitment process.

Specific training is provided to those who deliver safer recruitment.

The Club's safer recruitment process includes:



The Club also requires all agency staff and consultants to sign a self-declaration Form. This requires employees to declare any criminal history they may have. Roles this applies to include but is not limited to:

- Agency teachers
- Agency physios
- Agency interpreters
- Drivers

Consultants and agency staff who undertake a regulated activity with all vulnerable groups must have a valid Enhanced DBS WHERE ELIGIBLE. This will need to be verified through the DBS number and date of issue.

If a person's criminal record check reveals cautions, convictions, community resolutions, warnings or final reprimands, the Club will consider the nature of the offence(s) in deciding if the person is unsuitable for working with vulnerable groups.

The 'standard' and 'enhanced' criminal record check will show an employer past crimes, even if they're spent. Guidance on what classifies a 'Spent conviction' can be found at www.gov.uk/exoffenders-and-employment.

The Club will conduct a risk assessment to evaluate the DBS information and the person may be required to attend a risk assessment meeting with the relevant Designated Safeguarding Officer (DSO) prior to any recruitment decision being made.

If a person is not suitable for a job because of a spent conviction or caution, the Club may withdraw a job offer.

On occasions a participant may themselves pose a risk through their criminal past and a risk assessment in relation to the participant may be required.

PARTICIPANTS WITH CRIMINAL RECORDS

Child Protection in Sport Unit (NSPCC) has produced guidance in this area which should be referred to if needed: **Making safe and fair decisions about membership for people with criminal records.**

1. Being a participant or fan is not exempt from The Rehabilitation of Offenders Act, meaning it is unlawful to refuse or withdraw membership or to prejudice a participant or fan in any way when a caution or conviction has been spent.
2. Whilst there is no requirement to perform checks on all participants and fans, there are occasions when a criminal background may come to light including, word of mouth, newspaper or online reporting, through the police or statutory agency or self-disclosure.
3. Following information coming to light, the Club will establish whether the conviction is unspent. This can be achieved through a self-declaration form or a face-to-face meeting.
4. The Club may also request a basic disclosure from the individual if confirmation of the conviction is required.
5. Following confirmation of an unspent offence the club may carry out a safeguarding risk assessment based on the activity being attended. Following the risk assessment, a decision will be made about the terms of participation.

6. In the event that a spent conviction comes to light, safeguarding should be at the heart of any decision. Any breaches of current Code of Conduct or current behaviours falling short of club values should be dealt with through normal disciplinary procedures, taking no account of the spent conviction.

INDUCTION AND TRAINING

During the induction process, all staff will have mandatory in-house training on identifying and reporting concerns in respect of safeguarding. This training will also incorporate the Premier League guidance for safer working practice. Employees will also receive copies of this Policy, along with other Club policies. Staff must sign that they have read and agreed the contents.

The training will include an overview of this policy with specific emphasis on:

- The principles and obligation to safeguard within a sporting environment
- An understanding of the signs and symptoms of abuse (sexual, physical, emotional, neglect, grooming, online, and radicalisation)
- Practical advice regarding safeguarding practicalities in your role
- Dealing with a disclosure
- How to report a safeguarding concern
- The impact of holding a position of trust and examples of good and bad practice
- The safeguarding structure at the Club
- Ensuring the wellbeing of those involved in matters related to safeguarding issues are supported
- All internal safeguarding training will embed a culturally sensitive approach to safeguarding practice
- The difference between adult safeguarding and child safeguarding covering consent and capacity

Safeguarding training updates in line with current local and national safeguarding trends and priorities will be provided as part of the club's ongoing commitment to Safeguarding. DSOs will attend mandatory training annually.

RE-CERTIFICATION

It is an expectation of all Club staff who work with adults with care and support, needs to keep their certificates up to date. All certificates including DBS, FA Safeguarding and First Aid expire after three years.

TRAINING REFRESHERS

Safeguarding refresher training is to be completed annually online. Every three years, all core staff are required to have in person safeguarding refresher training.



PERSON CENTRED SAFEGUARDING

None of us can make these choices for another adult. If we are supporting someone to make choices about their own safety we need to understand 'What matters' to them and what outcomes they want to achieve from any actions agencies take to help them to protect themselves.

The concept of 'Person Centred Safeguarding'/'Making Safeguarding Personal' means engaging the person in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety. Organisations work to support adults to achieve the outcomes they want for themselves. The adult's views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe. There may be many different ways to prevent further harm. Working with the person will mean that actions taken help them to find the solution that is right for them. Treating people with respect, enhancing their dignity and supporting their ability to make decisions also helps promote people's sense of self-worth and supports recovery from abuse.



If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate (usually from a third sector organisation).

THE SIX PRINCIPLES OF ADULT SAFEGUARDING

The Care Act sets out the following principles that should underpin the safeguarding of adults.

EMPOWERMENT

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

"I am asked what I want as the outcomes from the safeguarding process, and this directly inform what happens."

PREVENTION

It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is. I know how to recognise the signs, and I know 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, and they will only get involved as much as is necessary."

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

Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

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

ACCOUNTABILITY

Accountability and transparency in delivering safeguarding.

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

EXAMPLES OF WORKING PRACTICES: GOOD PRACTICE

The following are regarded as good practice when working with adults at risk and all employees, workers, agency staff and volunteers must adhere to the following principles when undertaking their work. By doing so, these behaviours become normalised and the risk to vulnerable groups decreases. This list is not exhaustive:

Empower vulnerable people by encouraging them to make decisions about their lives.

Act before harm can occur. Prevention is the key to safeguarding, as it shields vulnerable people from abuse and neglect.

Be proportionate. Safeguarding intervention should never exceed a vulnerable person's needs.

Support and represent adults you are working with. Often it may feel that there is no support available.

You should also immediately respond to issues or worries and swiftly remove at-risk people from harmful situations to prevent potential harm.

Partner with local authorities and care resources to provide the best safeguarding support. This collaboration will avoid conflicting care responses and allow you to coordinate support and offer the safeguarded individual multiple providers.

When you support a vulnerable person, they need to understand the roles and responsibilities of each of their caregivers. You should provide important contact details in case they require assistance.

Another key element of accountability is effective communication between your teams and the local authorities and services. Explain each new development so that everyone is aware of the situation. Subsequently, you can arrange and coordinate further support.

EXAMPLES OF WORKING PRACTICES: POOR PRACTICE

The following are regarded as poor practice when working with adults at risk and all employees, workers, agency staff and volunteers must avoid such behaviour. These types of behaviours should be challenged. By not doing so, such behaviour becomes normalised and the risk to adults at risk increases. This list is not exhaustive:

Harassment of a participant (consciously or unconsciously) because of their (perceived) disability or other protected characteristics.	Not meeting the needs of the participant e.g. training without a necessary break.	Allowing bullying or unacceptable behaviour to continue unchallenged.
Spending unnecessary time alone with adult at risk outside of the remit of a role.	Encouraging, allowing, or engaging in inappropriate touching of any form.	Giving preferential treatment to individuals.
Engaging in financial transactions on behalf of individuals.	Making personal relationships and overstepping professional boundaries.	Meeting online or in person with participants you have met through the workplace.

WHAT ACTION SHOULD YOU TAKE IF YOU SUSPECT ABUSE OR POOR PRACTISE AGAINST AN ADULT HAS OCCURRED?

You cannot assume that someone else will act as everyone holds the safeguarding responsibility.

- You must act if you have a concern about the safety and/or welfare of an adult.
- You must act if you have a concern about someone's behaviour towards an adult.

Immediate considerations when dealing with abuse against an adult:

- Make an evaluation of any risks and take steps to ensure that the adult or others are not in immediate danger. Ensure that other people are not in danger.
- If a crime is in progress or a life is at risk call emergency services on 999.
- Encourage and support the adult to report the matter to the Police if a crime is suspected and not an emergency.
- Safeguard any potential evidence. Do not tamper with, clean up or move any potential evidenced if a crime is suspected.

In the event of the above, as soon a reasonably practicable you should report your concerns to one of the following:

- A Designated Safeguarding Officer

WHISTLEBLOWING AND COMPLAINTS

The Club recognises the risk of things going wrong or unknowingly harbouring poor practice and believes it has a duty to identify such situations and implement measures to mitigate such risks. As such, the club encourages a culture of openness and one of prevention rather than simply cure.

If you feel there is a requirement to whistle blow, you should first consult your line manager. If the matter concerns your line manager, you should contact the next in line senior manager.


The full Whistleblowing Policy is available for staff under 'Policy Centre' on Core HR. If you are unable to raise concerns internally, please consult the NSPCC Whistleblowing Helpline on 0800 028 0285.



The Academy and the BHAFC Foundation have formal complaints procedures which can be accessed via the Club's and BHAFC Foundation's websites.

The following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice:

- Listen carefully to the adult. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the individual to 'shut down', retract or stop talking.
- Let them know they've done the right thing. Reassurance can make a big impact to the individual who may have been keeping the abuse secret.
- Don't talk to the alleged abuser. Confronting the alleged abuser about what the individual has told you could make the situation a lot worse.
- Ask the adult what action they would like you to take. This may involve contacting a professional or another family member.
- An adult should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present and any marks raising concern should be recorded on the skin map included within the incident and report form.
- If the adult does not want you to take any further action you have to respect this decision, unless you are concerned someone else may be at risk or are aware that the individual does not have capacity (as assessed by a professional).
- You should make the adult aware that you will notify the Club's safeguarding team and that their wishes will be respected.
- Where the adult provides consent for their disclosure to be shared, do not delay reporting the abuse. The sooner the abuse is reported after the adult discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.

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- Write down everything said and what was done and sign and date the notes if handwritten. An incident report should either be made by contacting the safeguarding team directly or scanning the QR code below: **SEND QR CODE**
 - Investigations into possible abuse will require careful management. In these cases, the Club's safeguarding team will first seek the advice of the Football Association Safeguarding Team, the Premier League Head of Safeguarding, Adult Social Care, or the police before setting up an internal investigation and take their advice.
 - In any case of suspected abuse, as soon as the local authority or the police have been informed, the club must provide a report to the FA Safeguarding Department, the Premier League Head of Safeguarding and the club's Chief Executive Officer. Any external local authority provision will naturally take the lead on any case.
 - **Doing nothing is not an option; it is your responsibility to act.**

What happens where the allegation of poor practice or abuse is made against employees, workers, consultants, agency staff and volunteers?

If an allegation is made against someone who works within the Club, there are three types of investigation that may occur. They are not mutually exclusive.

- A criminal investigation by the police
- An investigation by the local authority in a multi-agency approach
- A disciplinary or misconduct investigation led by the Club; this may also involve the FA depending on the role of the alleged abuser

The alleged abuser will be legally entitled to anonymity until they are either charged with an offence or they waive their anonymity. All employees involved in an investigation or are privy to such information have a legal duty to maintain confidentiality and only provide information to those that need to know.

The employee, worker, consultant, agency staff or volunteer who the allegation concerns will normally be informed as soon as possible after the result of the initial investigation is known.

If it is subsequently established that the allegation was false or malicious, on the basis of further investigation, a written record will be made of the decision detailing the justification for the decision. The person whom the complaint has been made against will normally be informed and the matter will be closed. Allegations that are found to be false or malicious will be removed from personnel records and not referred to in any reference.

Where a criminal investigation is continued, the person concerned will be suspended on full pay if no reasonable alternative. The reasons and justifications for suspension will be recorded.

In the event that a member of staff is dismissed or resigns in circumstances where s/he might otherwise have faced dismissal for a safeguarding related reason, the Head of Safeguarding will act in accordance with FA regulations and DBS guidelines and make the necessary referral to the DBS, the FA and the Premier League as appropriate.

RECORDING OF SAFEGUARDING CONCERNS

Safeguarding will result in records being made of concerns. A record of the steps taken to manage concerns as well as record of the outcomes will be made.

The Information Commissioners Office 2020 makes it clear that the handling of data containing personal information should be:

- Adequate, relevant and not excessive for the purpose for which they are held
- Accurate and up to date
- Only kept for as long as is necessary

To ensure that any records being made are in line with the General Data Protection Regulation (GDPR) the Club will ensure:

- Records are made for reasons of ongoing safeguarding concerns
- Retain records for only as long as necessary to ensure that safeguarding of children can occur effectively
- Destroy records when they are no longer necessary
- Record safeguarding information in a secure online space which keeps records confidentially and securely in a separate file for each child. The system used for this is MyConcern

RECORDING CONCERNS ABOUT ADULT BEHAVIOUR

Sometimes concerns might be raised about an adult who works or volunteers with vulnerable groups. This could be because they have:

- Behaved in a way that has harmed, may have harmed, or could harm a vulnerable person
- Is under investigation for or committed a criminal offence against, or related to, a vulnerable person
- Behaved in a way that indicated they are unsuitable to work with vulnerable groups
- Is inconsistent with the staff Code of Conduct, displays poor practice, or acts outside of the Club values. This includes inappropriate conduct outside of work.


If concerns have been raised about an adult's behaviour around vulnerable groups, the records should keep in their personnel file either until they reach the age of 65 or for 10 years – whichever is longer (IRMS, 2016; Department for Education (DfE), 2020).

This applies to volunteers and paid staff. For example, if someone is 60 when the investigation into the allegation is concluded, the Club would keep the records until their 70th birthday. However, if someone is 30 when the investigation into the allegation is concluded, the Club keep the records until they are aged 65.

Information should be kept for this length of time even if the person stops working or volunteering for the organisation.

Records relating to concerns about an adult's behaviour should be kept in the person's confidential personnel file (not in a central 'concerns log') and a copy should be given to the individual.

All sports organisation must comply with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR).



Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.

Processing information includes record keeping. Records relating to safeguarding concerns must be accurate and relevant. They must be stored confidentially with access only to those with a need to know.

Sharing information, with the right people, is central to good practice in safeguarding adults. However, information sharing must only ever be with those with a 'need to know'. This does NOT automatically include the persons spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/ friends/ carers need to know in order to help keep the person safe.

The purpose of Data Protection legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation
- Case management meetings can take place to agree to co-ordinate actions by the organisation

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information.

The circumstances when we need to share information without the adult's consent include those where:

- it is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk
- you believe they or someone else is at risk, including children
- you believe the adult is being coerced or is under duress
- it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed
- the adult does not have mental capacity to consent to information being shared about them
- the person causing harm has care and support needs
- the concerns are about an adult at risk living in Wales or Northern Ireland (where there is a duty to report to the Local Authority).

When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

SUPPORT FOR EMPLOYEES

The Club recognises that it can be deeply upsetting when a child or young person discloses that they have suffered abuse. The Club has support structures in place to help employees who have received a disclosure or who are being asked to participate in an investigation into poor practice or abuse. If you need further advice regarding this, contact the People & Culture Team or the Head of Safeguarding.

Staff have access to the Club's Employee Assistance Programme where they can access wellbeing support.

EMPOWER ADULTS TO BE HEARD

Adults at risk must be supported to express their views, wishes and feelings. Staff should create a safe and respectful environment, listen carefully, and ensure adults understand their options. Adults should be involved in decisions about their own safety wherever possible, with advocacy offered if they need help to communicate. Their views must be recorded accurately and shared with the safeguarding team in line with consent and information-sharing requirements.



MENTAL HEALTH

The Club is committed to ensuring and promoting the mental health and wellbeing of all players, staff and participants.

The mental health and wellbeing of Players is a key strand within the Academy strategy. The Performance & Wellbeing team are in place and trained to support the wellbeing as well as to look out for signs that may indicate fluctuation in the mental health of players.

RISK ASSESSMENTS

Risk assessments will always be completed for Club activities. This is to minimise and prevent risks to vulnerable groups. Such risk assessments will consider the particular vulnerabilities or increased risks that may occur when an adult at risk is partaking in a Club activity.

Examples of where risk assessments are required are:

- Trips and tours
- Transport
- Changing area
- Host family provision
- Matchday activities



LOST OR MISSING ADULTS AT RISK

Every effort must be made to ensure adults risk remain either with their parents, carers or activity leaders. However, should a child or young person become lost or go missing whilst engaging with a Club activity, the Club will make every effort to locate the child as quickly as possible.

If the adult at risk is not located, staff should contact security and/or a member of the safeguarding team. If the child or young person is not located after 10 minutes the Club will contact the parents or carers and agree with them to contact the police. If the parents or carers are not available, the Club will call the police directly.

The safeguarding team will be made aware of any instances in which an adult at risk goes missing whilst engaging in Club activities including any action taken by the Club and the eventual outcome.



REVIEW

The Club will review this policy to ensure ongoing compliance with safeguarding requirements. This will occur annually, at the end of every season, or whenever there is a change in legislation, guidance, governing body rules or major safeguarding incident.

During the COVID-19 pandemic, the Club altered its safeguarding working processes to reflect the changed environment, not least in respect of lockdowns and remote working. As at the date of this policy, we have returned to work in an effectively “pre-COVID” style of working and some of the amended working practices are no longer of relevance. However, the Club commits to ensure that its working processes are kept under review and can be adapted to ensure that safeguarding is still given primacy were there to be another pandemic, lockdown or similar transformative event.

Richard Valder-Davis and Sarah Byrne are responsible for conducting a review of the Safeguarding Policy on an annual basis or where changes in legislation or significant events prompts an earlier review.