



SAFEGUARDING CHILDREN & ADULTS AT RISK – POLICY AND PROCEDURES

Aston Villa Football Club is committed to creating a culture where safeguarding responsibilities and procedures for raising concerns are widely understood and embedded in our values. We are fully committed to seeking to provide a safe environment for everyone involved in the club.

1. Introduction

Safeguarding children and adults at risk is of paramount importance for Aston Villa Football Club (“the Club”). We are committed to raising awareness and empowering everyone we engage with to create a safer environment and identify and report safeguarding concerns promptly and effectively. We all share a responsibility for promoting and protecting the safety and welfare of children and adults at risk, irrespective of individual roles and responsibilities.

2. Policy Statement

This Policy outlines the procedures that the Club’s group of companies including Aston Villa Women and the Aston Villa Foundation are committed to.

This Policy aims to promote safer working practices and ensure that prompt and effective action is taken to safeguard the wellbeing of children and adults at risk. This Policy is designed to encourage the development of good practice and stress the responsibility of all to be alert to early indicators of abuse, neglect and exploitation and to act quickly when there is any concern regarding the welfare or safety of a child or an adult at risk.

This Policy and the associated procedures reflect local and national statutory responsibilities, government guidance and comply with Premier League requirements.

All individuals within the Club including players/employees/volunteers/casual staff - have a role and responsibility to help ensure the safety and welfare of children and adults at risk.

The Club accepts its requirement to fulfil its duty of care, which means that the Club must do everything that can be reasonably expected to safeguard and protect children from harm, and to act when there is a reason to believe that an adult at risk is being harmed or is at risk of harm.

3. Principles and Values

The guidance given in this Policy and procedures is based on the following principles:

- Safeguarding and promoting the welfare of children and adults at risk is everyone's responsibility.
- Everyone has the right to be free from harm and abuse.
- This Policy and our work across the Club aim to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation or socio-economic background, all individuals have a positive and enjoyable experience of the activities delivered by the Club.
- The Club is committed to ensuring that activities take place in a safe environment, where children and adults at risk are protected from abuse whilst under our care.
- The Club actively listens to children, adults at risk, parents/carers and personal assistants to ensure their views are considered.

4. The Safeguarding Leadership Team

Whilst the Club believes that safeguarding is everyone's responsibility, the Club's safeguarding team holds specific strategic and operational responsibilities.

Senior Safeguarding Lead's responsibilities are to:

- ensure that effective safeguarding policies and practices are approved, implemented, and monitored throughout the Club;
- take steps to ensure that any safeguarding risks arising from Club activities involving children or adults at risk are assessed and risk mitigation strategies are put in place;
- ensure that the Executive Team are immediately advised of any major causes of safeguarding concern; and
- ensure safeguarding is a standard agenda at board meetings to ensuring a top-level awareness across the Club.

Head of Safeguarding and Safeguarding Team's responsibilities are to:

- provide effective leadership and management with a clear sense of direction and purpose in the safeguarding of children and adults at risk ensuring full compliance across the Club with Premier League rules and government legislation, whilst maintaining key stakeholder relationships both externally and internally;
- be accountable for the day-to-day case management of new and ongoing safeguarding concerns, including investigations, and working with external agencies.;
- be a recognised point of contact for those wishing to raise safeguarding concerns or seek help and guidance connected with safeguarding; and
- lead on the development, implementation and communication of safeguarding policies and procedures

Designated Safeguarding Officers (DSO's) responsibilities are to:

- support the Club's Head of Safeguarding to proactively promote and raise safeguarding awareness across the whole Club and assist with responding appropriately to safeguarding concerns and allegations;
- work with the Club's Head of Safeguarding to implement and promote the Club's Safeguarding Policies and procedures within their department;
- act as a source of safeguarding support and advice within their department;
- promote a safe working environment considering health and safety within the workplace, safer recruitment, and physical and emotional wellbeing;
- support colleagues to respond appropriately to concerns about the welfare or safety of children and adults at risk.

All Staff have a responsibility to:

- provide a safe environment for children and adults at risk and identify individuals who may require additional support due to additional vulnerabilities.
- take appropriate action and report safeguarding concerns.

The Club recognises the role and responsibilities of the statutory agencies in safeguarding children and adults at risk and is committed to complying with the procedures of the local safeguarding partners and external agencies.

5. Legislation and Guidance

The Club is governed by the rules and regulations set out by several key agencies including the Government, The Football Association, Premier League, the NSPCC Child Protection in Sport Unit and Adult Safeguarding Board, amongst others. The content of this Policy is underpinned by legislative and statutory documents and policies as presented by these key governing agencies.

Key documents underpinning these policies include:

- 'The Children Act' (1989) (2004) - HM Government
- 'Working Together to Safeguard Children' (2023) - HM Government
- Safeguarding Vulnerable Groups Act (2006)
- 'Keeping Children safe in Education' (2024) – Dept for Education
- 'Human Rights Act' (1998) – HM Government
- Data Protection Act (2018)
- The General Data Protection Regulation (GDPR) 2018
- 'Standards for Safeguarding and Protecting Children in Sport' (2018) – NSPCC
- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- Domestic Abuse Act 2021
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Acts 2005 and 2020
- Sexual Offences Act 2003
- All Premier League and FA safeguarding rules, regulations and guidance.
- The Club's Safeguarding Code of Conduct.

The Club is fully committed to ensuring that the best practice recommended by these legislations, policies and guidelines is implemented, maintained and embedded within the day-to-day working practice of all staff at all times.

Further legislation can be found: <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

6. Definitions

The term **"Staff"** applies to all those working for or on behalf of the Club, full-time or part-time, in either a paid or voluntary capacity, including players

"Child" refers to all young people who have not yet reached their 18th birthday.

"Adult at risk" refers to any person aged 18 years or older who:

- has care and support needs;
- is experiencing, or is at risk of, abuse or neglect;
- is unable to protect themselves because of their care and support needs

“Parent” refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, step- parents and foster carers.

“LADO” Local Authority Designated Officer investigates when a referral has been made in relation to a person in position of trust where there are allegations of abuse toward children.

7. Workforce Development and Training

It is essential that all Staff are confident in recognising, responding to and reporting any safeguarding concerns and that they all understand and adhere to this Policy the associated procedures.

The Club has developed a rigorous induction process which ensures that new starters are made aware of the importance of safeguarding, this includes completing safeguarding awareness training prior to them commencing their employment, attending a safeguarding induction and access to all safeguarding policies and procedures.

The Club has a Safeguarding Workforce Development Plan which details the training needs in all areas.

A key area for development is the Club’s Safeguarding Designated Officers (DSO’s). All DSO’s will attend additional training and have access to safeguarding supervision from the Head of Safeguarding or outside agency as required.

8. Safer Recruitment

All Staff recruitment is conducted in an open and transparent manner to ensure that the Club has the best Staff. The overall purpose of Safer Recruitment is to help identify and deter or reject individuals who are deemed to be at risk of harming children and adults at risk. Further information can be found in the Club’s Recruitment and Selection Policy.

9. Allegations Against Staff

Any concerns relating to a Staff member will be recorded and managed by the Head of Safeguarding, in liaison with the Head of Human Resources, The Head of Safeguarding and Head of Human Resources will complete an initial assessment of the information and determine the next steps, which may include an internal investigation, referral to the Police, LADO, Charity Commission and/or Premier League or The FA.

Please see the Club’s Managing Allegations against Staff policy for more information.

10. Whistleblowing

The Club also has a Whistleblowing policy which is intended to (i) encourage the reporting of any safeguarding concerns or suspected wrongdoing as soon as possible; (ii) provide guidance on how to raise those concerns; and (iii) reassure individuals regarding the raising of genuine concerns in good faith without fear of reprisals.

Please see the Club's Whistleblowing policy for more information.

11. Historical Allegations

The Club will manage any and all allegations of a historical nature in accordance with the relevant guidance from football governing bodies and/or external agencies, including guidance from the Police. In all cases, internal stakeholders will be identified and engaged to ensure an open and transparent process is undertaken.

12. Confidentiality

Every effort should be made to ensure that the 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 Head of Safeguarding, Head of Foundation and Directors of the respective Club group of companies.
- The adult and/or the person raising the concern.
- The Staff member engaged by the Club who has received the concern or disclosure.
- Any personal assistant or carer, where appropriate.
- Local Authority and Police, where appropriate.
- Dependent on the nature of the concern, the National Governing Body.

Safeguarding concerns may require a referral to outside agencies, this must be discussed with the Head of Safeguarding, prior to the referral being made.

Where possible, referrals will be made with consent and a record of this along with the justification for the referral must be recorded and kept on file. Any information stored will be stored in line with the Club's Data Protection Act 2018, GDPR 2018 and Data Retention Policies.

13. Partnerships and Commissioned Services

The Club takes seriously its responsibility to ensure that appropriate due diligence is conducted when engaging in new partnerships or services.

14. Complaints Procedure

A safeguarding complaint may involve:

- complaints regarding poor practice within Club activities or relating to children (under 18s) or adults at risk;
- complaints relating to the Safeguarding Team;
- a concern in relation to unsafe practice by Club Staff or partners.

All complaints should be emailed to the Head of Safeguarding via safeguarding@avfc.co.uk. If your complaint involves the Head of Safeguarding, contact the Senior Safeguarding Lead via Reception on 0121 327 2299 or by emailing the Premier League at safeguarding@premierleague.com.

15. Storing of Information and Data Protection

Concerns are recorded securely on MyConcern which is overseen by the Head of Safeguarding. The MyConcern system records how and when concerns are received and details how the concerns have been dealt with.

The Club Data Protection Policy is in line with current data protection legislation

16. Evaluation and Review

The Club will regularly assess the implementation and effectiveness of this Policy and associated procedures and will review the contents annually or whenever there are changes in legislation, new or revised government or statutory guidance, or as deemed appropriate by the Club.

Last review date: September 2024

Next Review date: September 2025



SAFEGUARDING CHILDREN POLICY AND PROCEDURES

1. Definitions

"Safeguarding and promoting the welfare of children" is defined for the purposes of this policy and procedure as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

"Child abuse" is when a child is intentionally harmed by an adult or another child – it can be over a period of time but can also be a one-off action. Abuse can happen in person or online. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. People may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger.

2. Safeguarding Children

The Club takes seriously any allegations or suspicions of abuse, neglect, poor practice or bullying and recognise that any safeguarding concerns need to be responded to and reported in line with the Club's reporting procedures – further information can be found below.

3. Wider Safeguarding issues

All Staff should have an awareness of wider safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth-produced sexual imagery) put children in danger. Below are some examples of wider safeguarding issues. Please note, this is not an exhaustive list, and further information can be found on the NSPCC website.

Grooming

Grooming happens when someone builds a trusting relationship with a child in order to exploit and abuse them. Grooming can take the form of sexual abuse, exploitation or human trafficking.

Anyone can groom a child, irrelevant of age, gender or race. Like bullying, grooming can take place in person or online. Groomers will often build a relationship with the child's family and friends, in order to encourage the child to trust them.

Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people who are or have been in a relationship. It can also happen between adults related to one another. It can seriously harm children and young people, and experiencing domestic abuse is child abuse.

It's important to remember that domestic abuse:

- can happen inside and outside the home
- can happen over the phone, on the internet and on social networking sites
- can happen in any relationship and can continue even after the relationship has ended
- both men and women can be abused or abusers.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical, can be facilitated and/or take place online.

Bullying and Cyberbullying

Bullying is any behaviour that intentionally hurts another person. It is the persistent or repeated hostile and intimidating behaviour towards a child or young person.

Bullying can happen anywhere, in person and online; bullying that happens online is often referred to as Cyberbullying.

Child on Child Abuse

Child-on-Child abuse can take various forms and include serious bullying, relationship abuse, domestic violence, child sexual exploitation, harmful sexual behaviour, and/or gender-based violence. This occurs when there is any kind of physical, sexual,

emotional, or financial abuse or coercive control exercised between children. It should be recognised that the behaviour in question is harmful to both the perpetrator (who is a child) and the victim. Behaviour may be intimate or non-intimate.

Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured, or changed for non-medical reasons.. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It's illegal in the UK.

Extremism & Radicalisation and Prevent

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young by seeking to sow division between communities based on race, faith or denomination, justify discrimination towards women and girls, persuade others that minorities are inferior or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

4. Position of Trust

Those who have responsibility for or authority/influence over children are in a 'Position of Trust'. Position of Trust is a legal term defined in the Sexual Offences Act 2003. This can be defined as one individual having power and influence over a child, whilst working or volunteering in a coaching, teaching, training, supervising or instructing capacity.

Those in a Position of Trust must not engage in sexual activity (either in person or online) or an intimate relationship with any child with whom they come into contact, through their role at the Club, even if the child is over the age of consent (16 and over).

5. Good Practice

The Club has adopted a Safeguarding Code of Conduct. All Staff and volunteers working with children and adults at risk should adhere to the following principles when undertaking their work:

- be a positive role model, displaying consistently high standards of behaviour and appearance;
- always use language that is appropriate and socially acceptable;
- create and maintain appropriate professional boundaries in all interactions whether face to face or online;
- make the experience of the sporting activity fun and enjoyable for all involved;

- treat everyone equally and with respect and dignity regardless of ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age or disability;
- always put the welfare and needs of the child or adult at risk first;
- create an open and supportive environment where individuals feel able to raise their concerns;
- appropriately challenge poor practice and act on any concerns;
- ensure that a written record is kept of any incidents or injuries that occur. This record should include details of the incident, any action taken, and any treatment given; and
- be aware that behaviour outside work which presents transferable safeguarding risk, breaches of the law and/or these policies and related procedures may result in criminal and/or disciplinary action being taken.

6. Poor Practice

The following examples are regarded as poor practice when working with children and adults at risk. Staff and volunteers must not:

- abuse or harm any child or adult at risk they are working with;
- allow abusive or concerning practices, allegations, or disclosures to go unreported or not acted upon;
- spend unnecessary amounts of time alone with children or adults at risk away from others;
- take children or adults at risk home or to any location where they will be alone with you;
- engage in rough, physical or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and must be avoided; or
- encourage, allow or engage in inappropriate touching of any form.
- place children or adults at risk in potentially compromising and uncomfortable situations;
- allow children or adults at risk to use inappropriate language or action without being challenged or corrected, for example, hazing or bullying;
- make sexually suggestive, demeaning, and critical comments to a children or adult at risk;
- giving continued and unnecessary preferential treatment to individuals;
- use their position to form inappropriate relationships with children or adults at risk;
- take, share or distribute photographs or video footage of children or adults without prior consent, please see the Social media and Player Announcement Policy;

- use Club equipment to access pornography or access pornography on personal devices when on duty; or
- access, make or distribute illegal or indecent content or images of Children or Adults at Risk.

All concerns should be discussed with the Head of Safeguarding and will be considered in line with the Club's Threshold Document, Club Code of Conduct, Allegation Against Staff Policy, Low-Level Concerns Guidance and The FA Threshold Referral Guidance.

7. Responding to Suspicions or Allegations of Abuse

Knowing what to look for is vital to the early identification of abuse and neglect. All Staff should be aware of indicators of abuse and neglect so that they are able to identify when an individual may need help or protection. If staff are unsure, they should always speak to the Safeguarding Team.

All Staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

A disclosure is when an individual tells you that they are being abused or that they have witnessed abuse. It is not the responsibility of anyone within the Club to determine whether or not abuse has taken place, but it is the responsibility of all those working, volunteering or otherwise associated with the Club to identify, respond to and report abuse or suspected abuse.

Managing a disclosure can be difficult however, the Club aims to ensure that all Staff are alert to the signs and indicators of abuse and how to respond appropriately.

Recognise

It is important to recognise abuse or suspected abuse. Abuse can be difficult to identify and Staff may not always be confident that abuse is taking place. However, it is the responsibility of everyone to ensure that any suspicions or allegations of abuse are identified and reported to the safeguarding team.

Respond

If abuse is suspected or a disclosure is received, Staff must gather the basic information and report it to the safeguarding team, or in the event of a serious concern, the Police or social care. It is not the role of Staff to investigate the concerns, but it is important to obtain the basic facts.

Report/Refer

Any suspicions or disclosures of abuse must be passed to the safeguarding team as soon as possible. Please refer to the Club Threshold document (Appendix 2 or reporting flowchart (Appendix 3) for further information.

Record

A written record of the information should be recorded on MyConcern or via email to a member of the safeguarding team. The report should include a description of the concern or disclosure, what happened, when and where it happened and who was involved. The report should be factual and, where possible, the individual's own words should be recorded. It is important that the report is free from opinion and takes into account the wishes of the child or adult at risk.

6. Review

The Club will regularly assess the implementation and effectiveness of these policies and associated procedures and will review the contents annually or whenever there are changes in legislation, new or revised government or statutory guidance, or as deemed appropriate by the Club.

Last review date: September 2024

Next Review date September 2025

7. Contact Details

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Appendix 1 Categories of Child 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.

Signs and Indicators of Physical abuse

- Unexplained injuries or marks
- Inconsistent explanations or refusal to discuss injuries
- Keeping arms and legs covered, even in hot weather
- Fear of medical help

Sexual abuse

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 there is consent. Sexual abuse 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. Children may not always understand that they are being sexually abused.

Signs and Indicators of Sexual abuse

- Avoiding being alone with or being frightened of someone they know.
- Age-Inappropriate language or sexual behaviour
- Bleeding, discharge or soreness in their genital or anal area.
- Sexually transmitted infections

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 meet the needs of another person.

Signs and Indicators of Emotional abuse

- Lacking in confidence, seeming shy.
- Struggling to control their emotions
- Unable to make and maintain age-appropriate relationships
- Acting in a way that is inappropriate for their age.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. Neglect is likely to result in the serious impairment of a child's health and/or development.

Signs and Indicators of Neglect

- Seeming dirty, smelly or having unwashed clothes
- Medical, dental or body issues
- Being left home alone
- Seeming tired and unable to concentrate on activities

Appendix 2 Safeguarding Threshold Guidance Document

1. Introduction

The purpose of this document is to ensure that all Staff can appropriately identify safeguarding concerns, respond accordingly, and report concerns as required.

2. Thresholds

Level 1

Where a concern has arisen about an individual, no immediate risk has been identified. The concern may relate to the general welfare and well-being of an individual and can be described as something that naturally occurs as a result of the activity. Examples may include:

- Mild mental health concerns e.g. anxiety, low mood or depression
- Low-level concerns at school – poor attendance, lack of engagement in learning or language and communication difficulties.
- Low-level concerns regarding hygiene, clothing or diet.
- Behavioural concerns, difficulty forming relationships or being a victim of bullying.

Should be monitored by Designated Safeguarding Leads

Level 2

Any situation or behaviour that causes a level of concern which may be dealt with at the point of concern or may require follow-up actions. Examples may include:

- Issues within the family home eg, separation, poor living conditions or unemployment.
- Poor behaviour, fights or the use of foul language.
- Age-inappropriate clothing – clothing too small or too big or not appropriate for the weather etc.
- Racial or homophobic comments

MUST BE REPORTED ON MYCONCERN

Level 3

An issue or behaviour that causes definite concern, a direct disclosure or a set of low-level issues that amounts to a concern. There is a clear element of risk and further action is required. Examples may include:

- Persistent disruptive behaviour
- Sexually inappropriate behaviour
- Difficulties engaging parents/carers
- Posting inappropriate content on social media

MUST BE REPORTED ON MYCONCERN

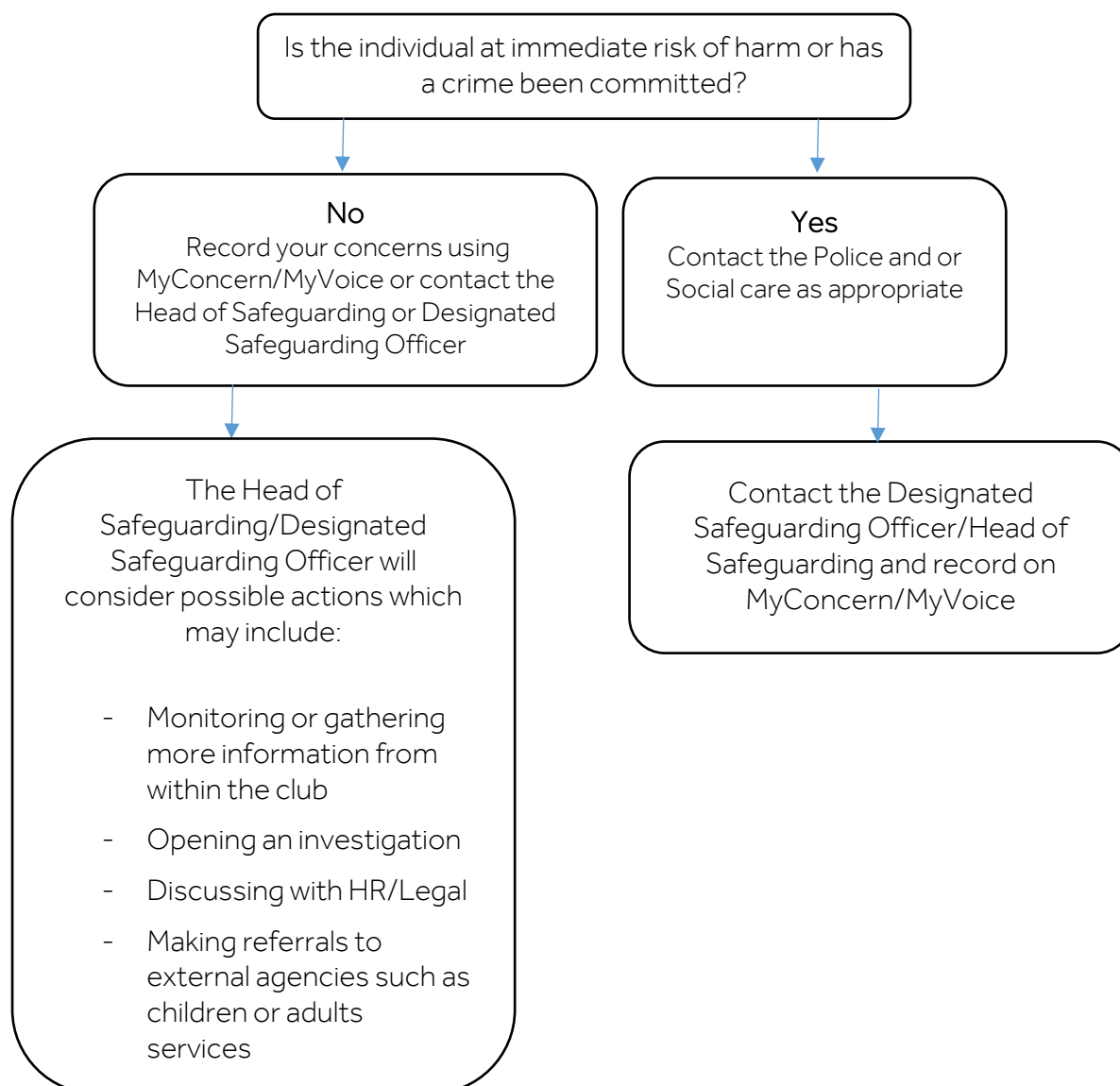
Level 4

An issue, behaviour or direct disclosure that presents a serious risk of harm. This may be a complex set of concerns which has resulted in the need for intervention from outside agencies. Examples may include:

- Significant mental health concerns e.g. suicidal ideation, schizophrenia or dementia
- Use of drugs or reports of excessive alcohol use
- Peer on Peer abuse and/or harmful sexual behaviour
- Involved in or linked to violence

MUST BE REPORTED ON MYCONCERN – the DSO must discuss with the HoS prior to making any necessary referrals

Appendix 3 Safeguarding children flow chart





SAFEGUARDING ADULTS AT RISK POLICY AND PROCEDURES

1. Safeguarding adults

The Care Act 2014 defines adult safeguarding as “Protecting an adult’s right to live in safety, free from abuse and neglect.”

Abuse is a violation of an individual’s human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any or all of the following types of abuse may be perpetrated as the result of deliberate intent, negligence, omission or ignorance.

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. Adults at risk can experience abuse and it is important to be observant and act if abuse is suspected. Further information on the categories of adult abuse can be found at Appendix 1 of this document.

2. The Six Principles of Adult Safeguarding

The Care Act 2014 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.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

3. Safeguarding Adults at Risk – Making Safeguarding Personal

Adults have the right to make their own decisions and it is important to engage individuals in conversations and ensure they feel heard. The individual should be involved in discussions about their situation and the best way to ensure their well-being and safety. The individual’s views should be taken into account to understand the best course of action for them.

Wherever possible safeguarding concerns should be discussed with the individual to get their view and keep them involved in the safeguarding process, seeking their consent to share information outside of the Club, where appropriate to do so.

This means the Club will:

- listen to the individual who is at risk;
- take note of their wishes and feelings;
- take them seriously;
- treat them with respect;
- support them to feel safe;
- support them to make their own decisions;
- keep them informed and involved; and
- tell them what will happen next.

[Making Safeguarding Personal \(MSP\) | Making Safeguarding Personal \(MSP\) | Birmingham Safeguarding Adults Board \(bsab.org\)](#)

5. Safeguarding Adults at Risk – Mental Capacity

In the UK, the law states that all individuals over the age of 16 have the ability to make their own decisions, unless it has been proved that they can't. The law states that to make a decision an individual must:

- Understand the information
- Remember it for long enough
- Think about the information
- Communicate our decision

An individual's ability to make decisions may be impacted by mental health needs, learning disabilities or physical ill health. Most individuals will be able to make their own decisions, with appropriate support from others, however being unable to make decisions may be referred to as "lacking mental capacity".

Mental capacity refers to the ability to make a decision at the time that decision is needed, and an individual's mental capacity can change, depending on the circumstance they find themselves in.

It is important to consider the following:

- It should be assumed that individuals can make decisions unless there is a reason to believe they cannot.

- Individuals should be supported as much as possible to enable them to make their own decisions.
- In the event that an individual is unable to make an informed decision, they should only be supported by someone who has their best interests in mind.

6. Good Practice

The Club has adopted a Safeguarding Code of Conduct. All Staff and volunteers working with children and adults at risk should adhere to the following principles when undertaking their work:

- be a positive role model, displaying consistently high standards of behaviour and appearance;
- always use language that is appropriate and socially acceptable;
- create and maintain appropriate professional boundaries in all interactions whether face to face or online;
- make the experience of the sporting activity fun and enjoyable for all involved;
- treat everyone equally and with respect and dignity regardless of ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age or disability;
- always put the welfare and needs of the child or adult at risk first;
- create an open and supportive environment where individuals feel able to raise their concerns;
- appropriately challenge poor practice and act on any concerns;
- ensure that a written record is kept of any incidents or injuries that occur. This record should include details of the incident, any action taken, and any treatment given; and
- be aware that behaviour outside work which presents transferable safeguarding risk, breaches of the law and/or these policies and related procedures may result in criminal and/or disciplinary action being taken.

7. Poor Practice

The following examples are regarded as poor practice when working with children and adults at risk. Staff and volunteers must not:

- abuse or harm any child or adult at risk they are working with;
- allow abusive or concerning practices, allegations, or disclosures to go unreported or not acted upon;
- spend unnecessary amounts of time alone with children or adults at risk away from others;
- take children or adults at risk home or to any location where they will be alone with them;

- engage in rough, physical or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and must be avoided;
- encourage, allow or engage in inappropriate touching of any form;
- place children or adults at risk in potentially compromising and uncomfortable situations;
- allow children or adults at risk to use inappropriate language or action without being challenged or corrected, for example, hazing or bullying;
- make sexually suggestive, demeaning, and critical comments to a children or adult at risk;
- give continued and unnecessary preferential treatment to individuals;
- use your position to form inappropriate relationships with children or adults at risk;
- take, share or distribute photographs or video footage of children or adults without prior consent, please see the Social media and Player Announcement Policy;
- use Club equipment to access pornography or access pornography on personal devices when on duty;
- access, make or distribute illegal or indecent content or images of children or adults at risk.

All concerns should be discussed with the Head of Safeguarding and will be considered in line with the Club's Threshold Document, Club Code of Conduct, Allegation Against Staff Policy, Low-Level Concerns Guidance and The FA Threshold Referral Guidance.

8. Responding to Suspicions or Allegations of Abuse

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify when an individual may need help or protection. If staff are unsure, they should always speak to the Safeguarding Team.

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

A disclosure is when an individual tells you that they are being abused or that they have witnessed abuse. It is not the responsibility of anyone within the Club to determine whether or not abuse has taken place, but it is the responsibility of all those working, volunteering or otherwise associated with the Club to identify, respond to and report abuse or suspected abuse.

Managing a disclosure can be difficult however, the Club aims to ensure that all staff are alert to the signs and indicators of abuse and how to respond appropriately.

Recognise

It is important to recognise abuse or suspected abuse. Abuse can be difficult to identify and staff may not always be confident that abuse is taking place. However, it is the responsibility of everyone to ensure that any suspicions or allegations of abuse are identified and reported to the safeguarding team.

Respond

If abuse is suspected or a disclosure is received, staff must gather the basic information and report it to the safeguarding team, or in the event of a serious concern, the Police or social care. It is not the role of staff to investigate the concerns, but it is important to obtain the basic facts.

Report/Refer

Any suspicions or disclosures of abuse must be passed to the safeguarding team as soon as possible. Please refer to the Club Threshold document or reporting flowchart (appendix1) for further information.

Record

A written record of the information should be recorded on MyConcern or via email to a member of the safeguarding team. The report should include a description of the concern or disclosure, what happened, when and where it happened and who was involved. The report should be factual and, where possible, the individual's own words should be recorded. It is important that the report is free from opinion and takes into account the wishes of the child or adult at risk.

9. Review

The Club will regularly assess the implementation and effectiveness of these policies and associated procedures and will review the contents annually or whenever there are changes in legislation, new or revised government or statutory guidance, or as deemed appropriate by the Club.

Last review date: September 2024

Next Review date: September 2025

10. Contact Details

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Appendix 1 Categories of Abuse

Types of abuse suffered by adults identified in the Care Act 2014 are:

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical abuse may also include the inappropriate use of restraint and/or involuntary isolation or confinement

Signs and indicators of Physical Abuse

- Unexplained injuries or marks
- Inconsistent explanations or refusal to discuss injuries
- Keeping arms and legs covered, even in hot weather
- Fear of medical help

Sexual abuse

Sexual abuse can include rape, attempted rape or sexual assault as well as non-consensual masturbation or penetration. Sexual abuse may also include non-contact activities, such as involving adults at risk in looking at, or in the production of, sexual images, watching sexual activities or encouraging adults at risk to behave in sexually inappropriate ways.

Signs and indicators of sexual abuse

- Avoiding being alone with or being frightened of someone they know.
- Inappropriate language or sexual behaviour

- Bleeding, discharge or soreness in their genital or anal area.
- Sexually transmitted infections

Psychological or Emotional abuse

Psychological or emotional abuse may involve behaviour that deliberately manipulates, frightens or hurts a person, impacting on their emotional wellbeing. This may include causing social isolation from friends and family, Intimidation, humiliation, and verbal abuse.

Signs and indicators of Psychological or Emotional abuse

- Out of character behaviour when particular individuals are present
- Withdrawal
- Low self-esteem
- Signs of distress

Financial or material abuse

This may include theft or a person's money or property by an individual who is in a position of trust. Examples may include, misusing or stealing a person's benefits or preventing them from accessing their money, fraud or the misuse of Power of Attorney.

Signs and indicators of Financial or Material abuse

- Unexplained lack of funds or funds missing from accounts
- An individual showing unusual interest in the person
- Changes to deeds, Power of Attorney or titles
- Rent/mortgage arrears

Modern Slavery

This can be defined as an individual being exploited by others for their own personal or commercial gain. An individual may be forced or tricked into an agreement, thus losing their freedom. Modern Slavery can include human trafficking, sexual exploitation and domestic servitude.

Signs and indicators of Modern Slavery

- Living in unsanitary, dirty or cramped conditions
- Fear of law enforcement
- Isolation from the family and/or the community
- Isolation from the community, seeming under the control or influence of others

Discriminatory abuse

This is any abuse that focuses on the differences or perceived differences between individuals. It is against the law in the UK to discriminate against anyone based on the below 'protected characteristics':

- Age
- Gender reassignment
- Marriage status (including civil partnerships)
- Being pregnant or on maternity leave
- Disability
- Race (including skin colour, nationality, or a person's ethnic or national origin)
- Religious belief
- Sex, and sexual orientation

Signs and indicators of Discriminatory abuse

- An individual being treated less favourably than others, because of a difference/perceived difference
- Putting support in place that places an individual at a disadvantage.
- Harassment or victimisation.
- Denying access to health benefits, education or support services

Organisational abuse

This can relate to poor care provided by an institution, care setting or within an individual's home. An individual may be neglected or can suffer due to a lack of policies, procedures and practices.

Signs and indicators of Organisational abuse

- Poor quality of care
- Lack of policies and procedures
- Lack of access to social and recreational activities
- Inadequate Staffing Levels

Neglect and acts of omission

Neglect refers to the failure to meet the basic needs of an individual. Neglect and acts of omission may include isolating and ignoring an individual. It may also include failing to provide access to care and support needs.

Signs and indicators of Neglect

- Poor living conditions
- Poor personal hygiene
- Lack of engagement with health services
- Uncharacteristic weight loss or eating patterns

Domestic Violence

Women's Aid defines domestic abuse as: "An incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer."

Signs and indicators of Domestic Violence

- Low self-esteem
- Isolation from friends and family
- Bruising, cuts or other unexplained injuries
- Low self-esteem
- Fear of outside agencies

Self-Neglect

This term covers a wide range of behaviours which relate to an individual neglecting to care for their personal hygiene or their surroundings.

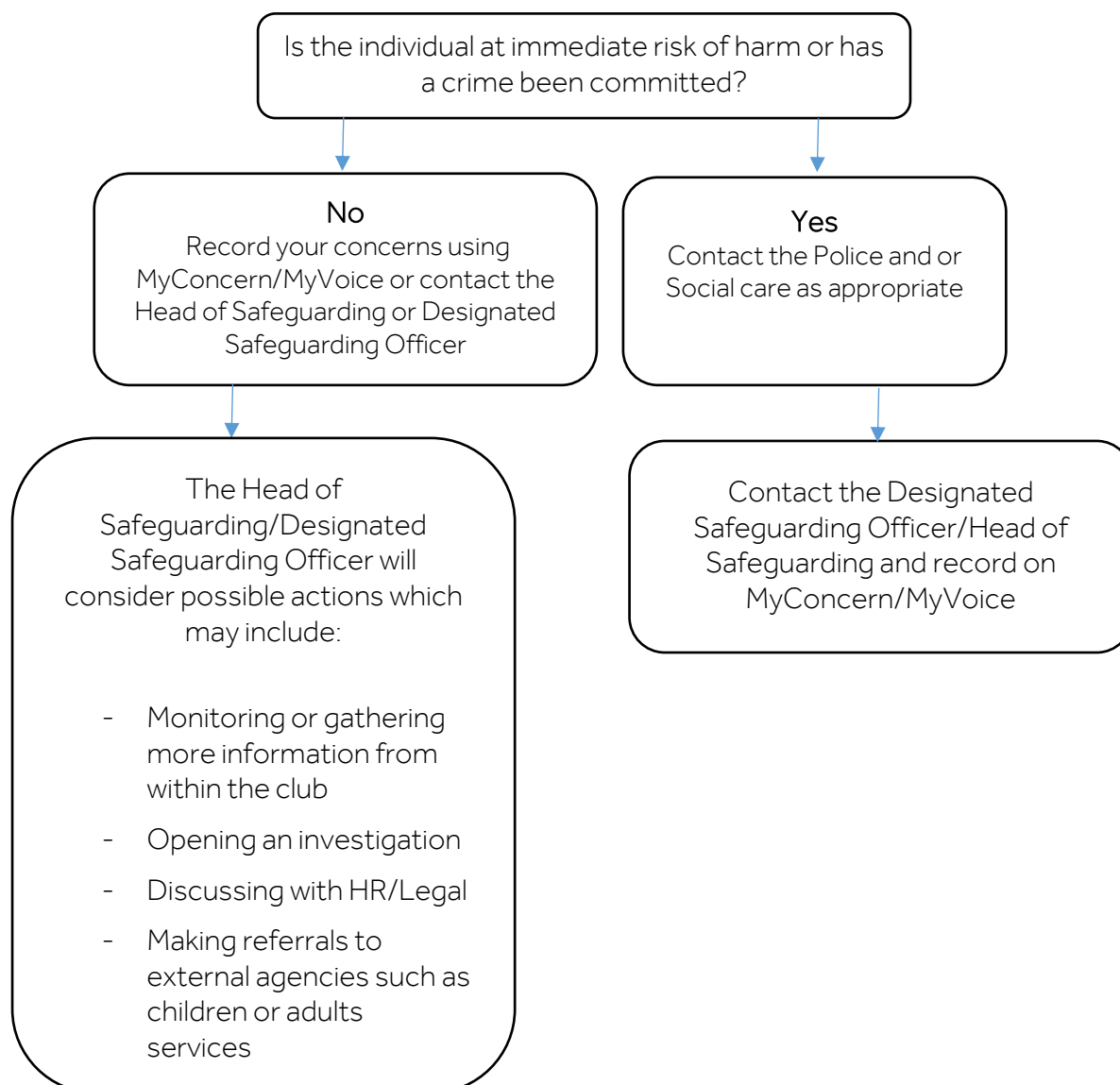
Signs and indicators of Self-Neglect

- Poor personal hygiene
- Hoarding
- Living in poor and unsanitary conditions
- Lack of food, shelter, appropriate clothing

Other types of harm that adults may experience include:

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

Appendix 2 Flow Chart





SAFEGUARDING THRESHOLD GUIDANCE DOCUMENT

Introduction

The purpose of this document is to ensure that all Staff can appropriately identify safeguarding concerns, respond accordingly, and report concerns as required.

Thresholds

Level 1

Where a concern has arisen about an individual, no immediate risk has been identified. The concern may relate to the general welfare and well-being of an individual and can be described as something that naturally occurs as a result of the activity. Examples may include:

- Mild mental health concerns e.g. anxiety, low mood or depression
- Low-level concerns at school – poor attendance, lack of engagement in learning or language and communication difficulties.
- Low-level concerns regarding hygiene, clothing or diet.
- Behavioural concerns, difficulty forming relationships or being a victim of bullying.

Should be monitored by Designated Safeguarding Leads

Level 2

Any situation or behaviour that causes a level of concern which may be dealt with at the point of concern or may require follow-up actions. Examples may include:

- Issues within the family home eg, separation, poor living conditions or unemployment.
- Poor behaviour, fights or the use of foul language.
- Age-inappropriate clothing – clothing too small or too big or not appropriate for the weather etc.
- Racial or homophobic comments

MUST BE REPORTED ON MYCONCERN

Level 3

An issue or behaviour that causes definite concern, a direct disclosure or a set of low-level issues that amounts to a concern. There is a clear element of risk and further action is required. Examples may include:

- Persistent disruptive behaviour
- Sexually inappropriate behaviour
- Difficulties engaging parents/carers
- Posting inappropriate content on social media

MUST BE REPORTED ON MYCONCERN

Level 4

An issue, behaviour or direct disclosure that presents a serious risk of harm. This may be a complex set of concerns which has resulted in the need for intervention from outside agencies. Examples may include:

- Significant mental health concerns e.g. suicidal ideation, schizophrenia or dementia
- Use of drugs or reports of excessive alcohol use
- Peer on Peer abuse and/or harmful sexual behaviour
- Involved in or linked to violence

MUST BE REPORTED ON MYCONCERN – the DSO must discuss with the HoS prior to making any necessary referrals