

# SAFEGUARDING ADULTS AT RISK POLICY AND PROCEDURES



Community  
Sports  
Trust

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## Trust's Commitment

Brentford FC Community Sports Trust ("Trust") is committed to its responsibility for the wellbeing and safety of every Adult at Risk who engages and participates in the Trust's activities. The Care Act 2014 section 42 identifies 'an adult at risk.' An Adult at Risk of Abuse or Neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, Abuse or Neglect and as a result of their care needs - is unable to protect themselves. The Trust will ensure there is an understanding that some vulnerable adults are at risk, as they are not able to protect themselves from harm, abuse or neglect. Where this is the case, all staff must adhere and operate within the guidance given in this Safeguarding Policy document.

The Trust will take an adult centered approach that ensures the Adult at Risk is at the centre of any decision making or plan, taking the needs of the adult into account. The professionals will work with the Adult at Risk, to help them understand and process what potential abuse is and how they can ask for help. The Trust will work with professionals involved and ensure additional measures are put into place to support those who are not able to protect themselves. The measures will take into account their needs including mental health, disability, ethnicity, gender, sexual orientation, age or illness.

There is no specific criteria to define an Adult at Risk, although legislation including the Care Act 2015 and Mental Capacity Act 2005 (MCA), provide some guidelines. The legislation recommends promoting Adults at Risk having more independence and understanding of their wellbeing, to prevent abuse and neglect. This preventative approach allows for the Adult at Risk to be supported, before any potential risk situations become harmful.

This policy and the procedures below shall apply to all Trustees, full-time, part-time and zero hour contracted Trust workers, volunteers and commissioning agents who work with Adults at Risk. Safeguarding is everybody's legal responsibility, and our aim is to ensure that every individual within the Trust is ready to play their part in the protection of Adults at Risk.

Every Adult at Risk who engages and participates within the sports and activities with the Trust should be able to participate in an enjoyable and safe environment and be protected from harm and abuse. It is the responsibility of management, project co-ordinators and every person working at or for the Trust.

The Care Act 2014 sets out the statutory responsibility for the integration of care and support between health and local authorities. Local authorities have statutory responsibility for the care of Adults at Risk. The Trust works across a number of boroughs and will have Adults at Risk participating; therefore, the Trust will work in partnership with others to meet its safeguarding responsibilities. Local authorities are responsible for leading a multi-agency local adult safeguarding system; the Trust will support the local authority in this role. The Care Act 2014 does not replace the Mental Capacity Act. The Care Act works alongside the Mental Capacity Act 2005 (MCA). ***Both legislations' emphasis is for the individual to maintain their independence and control over their lives.***

The Trust recognises its responsibility to safeguard the welfare of Adults at Risk engaging with the Trust by protecting them from Abuse, including Physical, Sexual, Financial and Emotional Abuse and from Neglect or Bullying.

The Trust's practices and procedures, in addition to continued training, will ensure that everyone knows exactly what is expected of them in relation to the protection of Adults at Risk engaged in the Trust's activities.

The Trust has a Designated Safeguarding Officer and a Deputy Designated Safeguarding Officer. The Safeguarding Team will work collaboratively to ensure the Trust can provide all staff and participants with the following:

- A robust safeguarding system dedicated to the welfare of all Adults at Risk
- Specific training for all staff when working with Adults at Risk and taking their needs into account
- A clear and direct reporting structure in the event of any safeguarding incidents
- Regular dialogue with local adult at risk safeguarding agencies, boards, and or external national bodies.

### **Trust's Objectives re Safeguarding Adults at Risk**

i) To provide all Trust staff, Trustees, full-time, part-time, zero hour contracted and volunteers an opportunity for training on Safeguarding Adults at Risk. This will ensure Adults at Risk are protected from harm and treated equally when taking part in activities.

ii) To demonstrate best practice in the area of Safeguarding Adults at Risk.

The Mental Capacity Act provides statutory guidance to protecting adults at risk. This includes:

- Protecting an individual who lacks the capacity to protect themselves
- When making any decisions about them, to help them as much as possible to be part of that process. Decisions should not be too restrictive to their lives, i.e. this means that any decision should not infringe the persons basic human rights, and any decision about the adult, needs to be made with care.
- Where appropriate and this is in their interests, decisions should also be made with relevant family members or carers.

iii) To recruit new staff, full-time, part-time, zero hours and volunteers following the Trust's **Safer Recruitment procedure**.

iv) To provide Carers or Key Workers (if Adults at Risk are unable to cognitively sign) with Session Codes of Conduct, to sign for relevant projects for Adults at Risks' participation. This will include information on Safeguarding and Whistleblowing Policies.

v) To promote high ethics and high standards throughout the entire Trust.

The Trust will liaise very closely with other professionals when there are Adults at Risk of harm involved in Trust activities. This will include working with the Safeguarding Adult Boards, local authorities, NHS and police. The Trust will also work with the Local Authority Designated Officer and other respective safeguarding agencies and follow police protocol should any Safeguarding issues arise at the Trust.

The Trust will work confidentially with the Premier League, English Football League, English Football League (EFL) Trust, the Football Association, and/or Brentford Football Club.

The steps taken to achieve the above objectives will be completed through continued training and awareness raising with all staff around safeguarding. Information will be put up in plain sight around the Trust offices and all staff will be sent via email / coaching temp, updates about any changes to legislation, reiteration of key information, such as signs of Abuse and how to report safeguarding concerns. In addition, staff will be issued with a summary booklet for this Safeguarding Policy and a Key Contacts Card re Safeguarding issues. The Trust will deliver in-house safeguarding refresher training days along with further safeguarding training including Internet Safety.

## **Key principles**

### **Principles which underpin adult safeguarding**

The Trust will develop a positive and pro-active approach to best protect all Adults at Risk who engage with activities across the Trust, enabling them to participate in an enjoyable and safe environment. When safeguarding Adults at Risk, the Trust will take into account the six key principles set out in the Care Act 2014. These are:

1. Empowerment – the Adult leads the process and is actively involved in decision making
2. Prevention – the Adult is supported and educated to understand what harm or abuse is
3. Proportionality – professionals and services will assess the level of their involvement and tailor that to the level of need
4. Protection – the Adult will be supported to report any abuse, take part in the safeguarding process and be involved as much as the Adult wants to or is able to
5. Partnership – professionals will work together and in partnership to ensure the best outcomes for the Adult, making any decisions ensuring the Adult is in the centre
6. Accountability – professional involved in the care of an adult to be transparent and accountable with the Adult during the safeguarding process and decision making.

The Mental Capacity Act 2005 (MCA) also underpins 5 key principles when safeguarding Adults at Risk. The Trust will follow the guidelines and ensure the Adult is able to be involved as much possible in the safeguarding process. These include

1. Assume that the person has capacity, unless they demonstrate otherwise – this allows for independence
2. Take measures which allows the person to make their own decisions – this can include resourcing, using visual aids and breaking information down
3. Understand that if the Adult makes an unwise decision, it does not indicate a diminished capacity
4. Act in the person's best interest, if they can't
5. Actions to make sure it's the least restrictive option for the adult.

All Adults at Risk have a right to be protected from Abuse, poor practice and exploitation, regardless of their age, gender (including transgender and gender reassignment), disability, culture, language, racial origin, religious beliefs or sexual identity.

All suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately.

The Trust will work in partnership with its governing bodies, partnering organisations, adult social care, Adults at Risk and their key workers (if they have one). The Trust will meet and review any concerns with staff involved, no more than 2 working days after a disclosure, allegation or event, to ensure the safety of the Adult at Risk and to review risk assessments in case of an event

The Trust will, when appropriate, report to the Disclosure and Barring Service (DBS) in accordance with their procedures, should any member of all staff, be accused of or should present to pose a risk of harm to adults at risk, so as to enable them to carry out their statutory duties to investigate and protect all adults at risk.

The Trust is committed to the protection of data, in accordance with the Trust's Data Protection Guidelines.

## **The Trust's Consultation – Adults at Risk**

The Trust will conduct appropriate consultation with Adults at Risk to ensure that any needs and concerns within projects or activities are monitored, reviewed and addressed. The Trust will be sensitive to the capabilities of the Adult at Risk and ensure they fully understand the consultation being undertaken. This is especially important for Adults at Risk who may have learning disabilities/additional needs. In this case the Trust will invoke the help of parents/carers/support workers in completing the consultation exercise.

The Trust will undertake and apply the following methods to this consultation process:

- Regular activity questionnaires
- Participant feedback forms including suggestion boxes
- Participant focus groups.

In undertaking this consultation, the Trust will:

- Ensure that consultation arrangements make it easy for the Adults at Risk to participate. For example, provide a questionnaire or feedback form that is sensitive to the Adult at Risk.
- Provide the Adult at Risk and parents/carers/support workers with initial briefings, explaining why they are being consulted; what they will be asked to do; what will happen to that information; and what may happen as a result.
- Post-Consultation feedback – provide meaningful feedback on the impact of their involvement following their participation. For example, highlight what changes will be made to the project as a result of their feedback.
- Make every effort to ensure that the Adults at Risk and their parents/carers/support workers – and the staff and volunteers that work with them – do not see consultation as a burden.

## **Specific Safeguarding Issues for Adults at Risk**

All Trust staff and volunteers should have an awareness of Adults at Risk safeguarding issues, some of which are listed below. The aims of safeguarding adults policies and procedures are to prevent any harm coming to them and to ensure their needs are not neglected. The Trust will support Adults at Risk to take ownership of the decision- making process. Questions and resources will be modified to meet their needs and the Trust will ensure they maintain control as much as their ability allows.

The Trust will ensure an ethos is established across the Trust which supports, identifies and reports any safeguarding concerns when Adults at Risk are involved with Trust activities. Staff will be aware that an Adult at Risk may not report any abuse or neglect due to fear of any repercussions.

**The Care Act of 2014 lists some of the safeguarding issues for adults at risk as listed below:**

- Adult at Risk missing from home or care
- Sexual exploitation - when Adults at Risk are not able to consent or are manipulated to consent
- Domestic violence
- Physical abuse - including misuse of medication or unjustified restraint or physical sanctions
- Psychological abuse – this includes emotional abuse, threats of harm, verbal abuse, threatening to leave the Adult at Risk on their own and abandoned and deprivation of contact with people.
- Financial or material abuse – this includes controlling their financial affairs, stealing money, committing fraud in their name, taking their material possessions. This can also include being coerced into sharing their property for unwanted or illegal activities, often under the guise of befriending.

- Neglect – includes neglect of medication, ignoring any medical needs or health care, food and clothing - Fabricated or induced illness
- Faith abuse – abusing the Adult through faith includes witchcraft, magic and the evil eye, this could be led by a faith leader supported by the parents
- Female Genital Mutilation (FGM)
- Forced marriage
- Gender based violence/violence against women and girls
- Mental Health issues.

## **SAFEGUARDING ADULTS AT RISK - PRACTICAL PROCEDURES**

Although the Trust's commitment is to safeguard Adults at Risk from harm or abuse, there may be an occasion when concern is raised over the treatment of an Adult at Risk. The Trust has procedures for reporting concerns about the welfare of an Adult at Risk in their personal life or another Adult at Risk at a Trust session.

The Trust will support Adults at Risk to make any safeguarding decisions which affects them. Guidelines from the Mental Capacity Act 2005 (MCA) suggest the following:

- Adapting to their communication needs including non-verbal or visual
- Presenting information in different forms including photos, drawings or videos
- Teaching and supporting the Adult at Risk to learn or learn new skills in different situations and ways to protect themselves including communicating if they are being harmed.

If an Adult at Risk informs staff directly that they are concerned about someone's behaviour towards them, it is a disclosure. As the person receiving the disclosure, you should:

- Under the MCA guidelines assess whether the person can decide for themselves with regards to safeguarding, can they understand and decide about their own situation? Are they able to communicate their needs with support and adapted resources? Is the environment conducive to their needs to be able to communicate their needs?

Then follow the below procedure

- a. Stay calm so as not to worry or frighten the Adult at Risk
- b. Ensure the adult is safe and not at risk of immediate harm
- c. Inform a member of the Trust's Safeguarding Team for advice as to what to do next
- d. Assess the situation, decide if any emergency services are required i.e. social services, health or police in conjunction with the Safeguarding leads or a senior manager at the Trust
- e. Tell the Adult at Risk that they are not to blame and that they are right to share this
- f. Take what the Adult at Risk says seriously; listen actively and reiterate that they were right in sharing this with you
- g. Explain what you will do next, which will be to take note of what has been said- take notes only in the Adult at Risk's own words. Include the following: Date, Time, Venue and persons present.

- h. Avoid asking leading questions and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said
- i. Read the notes back to the Adult at Risk to ensure you have got the details correct. Repeat or rephrase if needed and then re-write as they tell you
- j. Explain what you will do next, depending on the Adult at Risk's level of understanding, tell them you will contact your manager to discuss what the next steps will be. Find appropriate means of communication for them depending on their needs
- k. If the Adult at Risk needs immediate medical treatment telephone for an ambulance, inform paramedics of concerns and ensure that they are aware that this is a Safeguarding concern; Contact a member of the safeguarding team immediately thereafter if not possible beforehand.
- l. Reassure the Adult at Risk, but do not make promises of confidentiality or assume outcomes; reassure them that you want to make sure they are safe
- m. In the event of suspicion of Sexual Abuse, do not let the Adult at Risk bathe or shower until given permission to do so. Washing can destroy valuable evidence
- n. If the Adult at Risk has a parent/carer or key worker or social worker, or a health professional allocated to them, inform them immediately thereafter, unless you have specific reason not to e.g. if the Adult at Risk has named the parent/carer or key worker or social worker as the abuser. If there is reason not to notify the parents/carer or key worker or social worker, contact a member of the Trust's Safeguarding Team. If any of them are unavailable, contact the Trust's Operations Director. If the Operations Director is unavailable, contact local social services or the police for guidance.  
[Contact details on page 22](#)

### **Assessment after a concern is raised**

When a safeguarding concern involving an Adult at Risk is raised the assessment will meet their specific needs, considering their emotional, psychological, social and physical needs. When carrying out the assessment the Trust will take into account the following:

- Does the Adult meet the adult safeguarding concern areas as defined by the Care Act 2014?
- The wishes of the Adult – the Trust will take into account if are they able to express their wishes and contribute to the decision-making process and whether they are able to give consent to a professional for any decisions to be made
- The Adults appearance – do they look unkempt - this could be a sign of neglect and do they have suitable accommodation etc?
- Do they appear hungry and lack financial support for food, electricity, gas etc
- Do they appear nervous, anxious and fearful?
- Is there any obvious evidence of physical abuse?
- Consent - will the Trust have valid reasons for acting without the Adult's consent? e.g. when a professional is not meeting their duty of care responsibilities
- Are there other agencies involved including adult social care and health services to whom the issues should be referred?
- The Adult's communication skills – can they communicate or do the resources and approach need to be adapted?

## **Recording of suspicions, concerns or events**

Keep an accurate record, as there may be legal proceedings at a later date. This must include your name, date of disclosure/suspicion/concern/event, venue, the Adult at Risk's name using their initials.

The Designated Safeguarding Officer (DSO) or a member of the Safeguarding Team should be contacted as soon as possible.

Managers and Co-ordinators will support coaching staff to complete the safeguarding referral form which will be used as a means of tracking and monitoring any concerns staff have. For any serious safeguarding concerns, a Case Management Form will be completed.

If the disclosure is an allegation of abuse against a member of Trust staff, this should be confirmed by completing a Case Management Form. The Safeguarding Team will decide the next steps with a view to informing the Lead Authority Designated Officer (LADO), keeping a record via email, within 24 hours.

For any serious safeguarding concerns a Case Management Form will be completed if there is a risk a staff member will be a further risk to any Adult at Risk. The Trust will report this to other professionals and agencies including the local authorities, police, Premier league and the FA Case Management team as quickly as possible. This will be in line with the data sharing guidelines.

## **Information Sharing Guidelines**

The Trust will fulfill its legal responsibility to share information with key agencies e.g. social care, health and police where there is a safeguarding concern. Reviews have consistently highlighted that lack of information sharing has contributed to Adults being harmed or neglected. When safeguarding Adults at Risk it's important to maintain their confidentiality, as they have a right to this. However, if there is a risk of serious harm, the Trust will make a professional judgment to share the information for the welfare of the Adult at Risk, whilst taking in the guidelines from the local authority procedures, the Care Act 2014 and the Mental Capacity Act (MCA) 2005.

The Trust will ensure all information is maintained safely in accordance with the data protection legislation; including the GDPR and the Data Protection Act of 2018 which requires organisations to process data in a lawful manner. Information is shared on a "need to know" basis. Information should be factual and relevant to the specific safeguarding concern.

When sharing data regarding an Adult at Risk, the Trust will be transparent with the Adult at Risk and their family. The Trust will communicate clearly who the data will be shared with and the reasons for this and seek their consent where appropriate. If there are concerns for the safety of the Adult at Risk then the DSO and SSO will make an informed judgement, whilst liaising with the Operations Director (OD) and CEO, in sharing the information to stop any harm coming to the Adult at Risk.

The Trust will take into account any safety needs, both of the Adult at Risk and the public. If the safety of either is compromised, information will be shared through Egress the secure email system or documents will be password protected.

Clear records will be kept of the name and designation of the services contacted, the member of staff or Police Officer to whom concerns were passed and record the time and date of the call, in case any follow-up is needed. Staff should follow the Trust's processes and guidelines, either through Egress which is an encrypted email programme or password protection, when sharing sensitive safeguarding information.

Staff have had GDPR training and will need to adhere to the guidelines when sharing information and data, using the Trust Data protection policy. Staff are also provided with guidelines to sharing data and information with third parties.

Completed safeguarding referral forms are stored in a 'protected' folder, with access/permissions granted to the Safeguarding team, Operations Director and CEO, only. This is to ensure that the information saved on the Trust's SharePoint remains confidential. This will ensure that only certain staff are able to access sensitive safeguarding information when searching for files.

Staff are expected to sign a confidentiality agreement with regards to safeguarding and sensitive information, including any completed Incident or Case Management Forms. Sensitive safeguarding case information is password protected and shared within the Safeguarding Team and the relevant project co-ordinator/manager, to maintain confidentiality.

Consent forms which are completed by participants, who take part in any Trust activity also stipulate to parent/carers, that any safeguarding concerns will be reported to the relevant authorities, depending on the nature of the disclosure or concern.

## **Case Management**

### **In the case of abuse or alleged abuse from a member of Trust staff:**

#### **Steps to manage any allegations**

The Designated Safeguarding Officer will consult with the Trust's Operations Director and CEO to determine if there is any risk of harm to an Adult at Risk. If there is serious concern for an Adult at Risk, the incident will be accelerated very quickly and reported to the Local Authority Designated Officer (LADO), otherwise it will be reported within 24 hours of the allegation being made. If the incident does not put any Adult at Risk of harm, the Trust will address the behaviour of the staff member and they will resume their normal working duties, if appropriate.

All individual cases will be considered under the Trust's Misconduct and Disciplinary Procedures, irrespective of the findings of the Adult Social Care Services or Police enquiries.

The Trust will decide whether the nature of the concerns need to be disclosed to and dealt with by the appropriate sporting bodies and whether the Premier League or the FA Case Management team should be informed. This will be done very quickly if any Adult at Risk is at risk of harm.

All staff are expected to understand and operate within the Trust's Whistleblowing Policy and raise any safeguarding concerns about other staff's behaviour, with the Safeguarding Team and where appropriate their line Manager or Senior Manager, including the Chief Officer and Operations Manager for the Trust.

#### **Providing Support to staff members about whom allegations have been made**

The Trust also has a responsibility to the member of staff under investigation and they should be supported appropriately. The Trust will inform Human Resources, who will allocate suitable resources to support the staff member.

The Trust will inform the Premier League and the FA case Management Team with 48 hours of any serious or harmful allegations against a member of the coaching staff, who could potentially move to another area. If the incident becomes a legal matter the Premier League Safeguarding Manager will be informed immediately.

Individuals will be informed when they are the subject of a safeguarding concern and be provided a point of contact to keep them informed of proceedings. The staff member will be told of the nature of the allegation, how the enquiry is carried out and what the possible outcomes could be.

The Trust will treat the staff member fairly, help them understand the nature of the allegations and be honest. If they are suspended, pending further enquiries, they will be kept up to date with the investigation. The Trust will decide whether the member of staff or volunteer can be reinstated and how this can be handled sensitively. The Trust will reach a decision based upon the available information.

If there is any concern about a fellow member of staff acting or behaving inappropriately, it is important that you flag up any concerns you may have. You should refer to the Trust's Whistleblowing Policy which can be found in the Staff handbook and complements the Safeguarding Policies.

The Trust will carry out its own investigations independently of the Police and Adult Services and will do so where it believes this is necessary. The Trust will support all designated persons in carrying out their role and responsibilities.

#### Possible outcomes of a Disciplinary Investigation

- No case to answer
- Advice and/or warning as to future conduct
- Further support or training
- Supervision and/or monitoring
- Suspension
- Dismissal.

### **Complaints and Disciplinary Procedures**

A complaint may be made by an individual who feels they have been the subject of poor practice or a safeguarding concern.

In the first instance, the complainant is required to contact the Trust's Designated Safeguarding Officer. The Trust's Safeguarding Team will try to resolve the complainant's concerns and give appropriate assurances regarding the management of the case in question. A record of the resolution will be made and copied to the complainant. Staff can speak openly to their line manager and the Safeguarding Team. It is the ethos at the Trust that staff have good working relationships. The line manager will then liaise with the Operations Director and CEO. The DSO will notify the Operations Director as quickly as possible.

### **Appeals**

If the complainant is dissatisfied with the response and wishes to take the matter further, they should appeal to the Operations Director, in writing. The staff member will receive feedback within 48 hours.

The appeal must identify the specific decision being appealed and set out the grounds of appeal and the reasons why it would be substantially unfair not to alter the decision.

The appeal panel will consist of three [persons or trustees] not involved in the initial decision-making panel. Staff will be given notification of the outcome of the appeal within 5 working days.

### **Allegations of Non recent Abuse**

Allegations of Abuse could be made at any point. They can be made some time after the event (e.g. by a person who was abused, some time ago, by a member of Trust staff or volunteer who is still currently working with any Adult at Risk, either within the Trust or elsewhere). Where such an allegation is made, the Trust's Designated Safeguarding Officer should be informed immediately, who will liaise with the Operations Director. When an allegation has been made, the DSO will not investigate but keep a factual record of the account. The DSO will collect written details of the allegation or concern with dates, times, location and incidents. These will be collated and signed by the person who has received the allegation. Any discussions or decisions will also be recorded and signed within the written account. If the staff member still works within the Trust, they will be suspended, pending further investigation. If the staff member has moved on, then it will be reported to the relevant authorities. The DSO will record and report any allegations to the Local Authority Designated Officer (LADO), very quickly or as soon as possible.

The LADO (Local Authority Designated Officer) will oversee the investigation. If the alleged staff member no longer works at the Trust, the Premier League and the FA Case Management team will be notified immediately of any non-recent allegations. If it's unclear whether the incident is an allegation or a concern the LADO should be consulted for advice.

An example of an allegation would be "my coach or carer hits me" A concern would be, if a Trust staff member noticed unusual or extensive bruising on an Adult at Risk and they were concerned after speaking to the Adult at Risk. The LADO would be able to advise on the next steps.

### **Allegations made out of hours**

If there are any allegations outside working hours, a Risk Assessment should be carried out straight away. Staff will speak to the DSO. Any concerns should be reported to the Adult Duty Social Care Team for the particular local authority straight away and the LADO as soon as possible. If appropriate the police should also be informed within one working day or immediately if any other Adults are at risk of harm. All local authorities provide an out of hours Emergency Duty Social Work Team (EDT) during evenings, bank holidays and weekends. Contact numbers are located at the end of this document

The Trust will work collaboratively and in consultation with local partners and professionals including the police and social care, to protect any other Adults at Risk, who may still be at risk of harm from a particular individual.

### **Allegations against another professional working with the Adult at Risk**

If an allegation has been made against a professional working with an Adult at Risk, the details will be recorded through a Case Management Form. The Trust will seek advice from the LADO and a relevant senior manager within the organisation of the alleged professional. The Trust will also seek advice from Local Adult Safeguarding Boards.

### **Code of Conduct**

All Trust staff and volunteers are expected to conduct themselves at all times in a professional manner as set out in the **Trust's Employee's Handbook**

A general safeguarding code of conduct, providing staff and volunteers with guidance is set out below. The Trust is committed to its responsibility for the wellbeing and safety of every Adult at Risk who engages and participates in the Trust's activities. Trust staff and volunteers must:

- i. Recognise that the role of a member of staff and volunteer places him/her in a position of trust with regard to Adults at Risk with whom they come into contact in the performance of their role. They must uphold that trust at all times.
- ii. Not knowingly place themselves in a situation where they are alone with any Adult at Risk, endeavour to ensure that they work with groups of Adults at Risk and, where possible, that there is another adult in attendance at any meetings. Staff and volunteers must avoid remote areas and wherever possible leave doors open.
- iii. Avoid using inappropriate language in front of, about or to an Adult at Risk. Staff and volunteers must display consistently high standards of professional behaviour and appearance, acting as a positive role model for the Trust.
- iv. Be aware that even well-intentioned physical contact may be misconstrued by the Adult at Risk, observers or by anyone to whom this action is described. Never make physical contact with an Adult at Risk in a way which may be construed as being indecent. Be aware of cultural or religious views about physical contact and always be sensitive to issues of gender.
- v. Not offer to transport Adults at Risk in their personal vehicle or any other mode of transport e.g. motorcycle or moped. Groups may be transported where there is sufficient Trust staff (minimum x 2) and insurance cover in place. For further guidance please refer to the **Trust Transport policy**.
- vi. Not to make arrangements to contact, communicate or meet with Adults at Risk outside of Trust sessions.
- vii. Ensure the Safeguarding DSO is included and can review content of any WhatsApp groups set up on the Trust's behalf.

### **Consequences of non-compliance**

Staff and volunteers within the Trust are placed in a position of trust with regard to the Adults at Risk taking part in Trust activities. Anyone who abuses that trust will be subject to disciplinary action or in the case of a volunteer will be required to cease volunteering activities. The abuse may be reported to the police and relevant local authorities.

### **Trust Recruitment and Safeguarding Training**

All Trust staff and volunteers will undertake an induction process with the relevant Project Manager or Volunteer Coordinator. Trust staff are required to adhere to the following recruitment policies/processes:

- Safer Recruitment Policy
- Recruitment Procedure Guide
- Volunteer Policy
- Staff and Volunteer Induction process
- Whistleblowing Policy.

The Trust will provide appropriate training throughout the year for staff and volunteers, designed to support them in their understanding of Safeguarding issues and risk and protective factors. This training will be

delivered by the Designated Safeguarding Officer/Deputy Safeguarding Officer and representatives from appropriate support organisations agencies e.g. Local Authority Designated Officer. All training will be included in the Trust's annual training plan and available to staff on the Trust staff intranet. Staff will be provided with appropriate notice to ensure they are able to attend training

The Trust will also ensure that Safeguarding leads (DSO/Deputy DSO) are supported with training appropriate to their roles.

### **External Partners / Training Agencies / Suppliers**

The Trust may engage the services of other partner organisations, training providers and suppliers to improve and support the needs and understanding of the Trust staff/volunteers and the safety and well-being of Trust's participants.

The Trust will ensure the following procedures and standards are in place:

- Appropriate contract or Service Level Agreement detailing the following:
- Safeguarding qualification(s) e.g. current compliance with DBS checks
- Appropriate Safeguarding policy and procedures
- Health and Safety policy and procedures
- Public Liability Insurance
- Relevant qualifications
- Appropriate understanding of the needs of the organisation or group
- Relevant appropriate industry standards i.e. recognised industry training provider
- Due diligence - Checking cases or claims against partner/supplier/contractor in the last 3 years
- Cost comparison through tendering process (when appropriate).

### **Signs and Indicators of Harm and Abuse**

Adult at Risk are often reluctant to tell someone when they are being abused eg physically, sexually, financially, emotionally, so it is essential to be aware of the possible signs that an Adult at Risk's welfare or safety is being threatened.

There is rarely a clear sign and you may have to piece together various pieces of information and rely on your instinct that something does not seem quite right. You may have one piece of information that, when added to that of others, forms a clear picture of safeguarding risks and concerns

It is not the job of a Trust staff member to decide whether or not an Adult at Risk is being abused, this is the role of social care and the Police - but it is a legal responsibility to share concerns that they will then assess and investigate further.

### **Social Media**

A separate policy is provided staff and volunteers providing guidance on the appropriate use of social media – **see the Trust Social Media policy**. However, Trust staff and volunteers should be aware of the potential risks to Adults at Risk using social media.

With all emerging technologies there is the potential for misuse. Risks associated with user interactive services include: cyber bullying, grooming and potential abuse by online predators, identity theft and exposure to inappropriate content including self-harm, racist, hate and adult pornography.

Most Adults at Risk use the internet positively but sometimes behave in ways that may place themselves at risk. Some risks do not necessarily arise from the technology itself but result from offline behaviours that are extended into the online world, and vice versa.

Potential risks can include, but are not limited to:

- bullying by peers and people they consider 'friends' – this can include moving into and taking over their home, often for illegal purposes eg drug distribution
- posting personal information that can identify and locate a vulnerable adult offline
- sexual grooming, luring, exploitation and abusive contact with strangers
- exposure to inappropriate content
- involvement in making or distributing illegal or inappropriate content
- theft of personal information
- exposure to information and interaction with others who encourage self-harm
- exposure to information and interaction with others who encourage radicalisation and terrorism
- exposure to racist or hate material
- encouragement of violent behaviour, such as 'happy slapping' (the practice whereby a group of people assault someone at random while filming the incident on a mobile device, so as to circulate the images or post them online).
- glorifying activities such as drug taking or excessive drinking
- physical harm to vulnerable adults in making video content, such as enacting and imitating stunts and risk-taking activities • leaving and running away from home as a result of contacts made online.

### **Social media (Further Guidelines)**

The Trust will ensure social media accounts are password protected and passwords are changed regularly. The social media accounts are managed by the Trusts Graphic Designer, Marketing Manager, Communication Manager and the Health Manager (part of the senior leadership team). The Communication and Marketing team will monitor the accounts for any inappropriate material on social media sites. They will remove the material and inform the Safeguarding Team/OD and CEO for further action.

For any social media posts on Instagram, twitter or Facebook etc permission from parent/carer will be sought, this is a signed registration form informing parent's photos may go up on the Trust's social media sites.

When staff are using social media accounts with open access, they must ensure the content is appropriate as Adults at Risk could be following them. Adults at Risk may want to "friend" or "follow" staff, however staff should not follow back or accept any requests on their personal accounts  
Staff must also refrain from adding any emojis, symbols such as hearts or emojis with emotions in their messages. As these could be misinterpreted by any Adults at Risk.

Staff must ensure the Safeguarding lead DSO is included in any Trust WhatsApp groups in order that she can access and monitor their content.

## **Potential indicators of online grooming and sexual exploitation of Adults at Risk**

There is concern that the use of social networking services may increase the potential for sexual exploitation of Adults at Risk. Exploitation can include exposure to harmful content (including adult pornography and illegal child abuse images), and encouragement for adults at risk to post inappropriate content or images of themselves.

Predatory adults may use social networking and user interactive services as a means of grooming Adults at Risk for sexual abuse. Adults at Risk are considered vulnerable as they are not fully able to comprehend the request made by someone who wants to harm them. These vulnerabilities are stated in Care Act 2004 and MCA 2014)

- gathering personal details, such as age, name, address, mobile number, name of college or further education provider, and photographs
- promising meetings with celebrities or offers of merchandise
- offering cheap tickets to sporting or music events
- offering material gifts including electronic games, music or software
- paying vulnerable adults to appear naked and perform sexual acts
- bullying and intimidating behaviour, such as threatening to expose the Adult at Risk by contacting their parents to inform them of the Adult's communications or postings on a social networking site, and/or saying they know where the Adult at Risk lives, plays sport, or goes to college
- asking sexually themed questions, such as 'Do you have a boyfriend?' or 'Are you a virgin?'
- asking to meet Adults at Risk offline
- sending sexually themed images, depicting adult content or the abuse of others
- assuming a false identity on a social networking site to deceive an Adult at Risk
- gathering information about an Adult at Risk's interests likes and dislikes. Most social networking sites set a user's web page/profile to private by default to reduce the risk of personal information being shared in a public area of the site.

## Specific Safeguarding Issues

After training, all Trust staff and volunteers should have an awareness of the wide range of safeguarding issues, some of which are listed below. Staff and volunteers should be aware that behaviour linked to the areas of drug taking, alcohol abuse, truanting and sexting, place vulnerable adults in danger. Safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include but may not be limited to bullying (including cyber bullying), gender-based violence/sexual assaults, gang initiation and involvement and sexting.

Staff and volunteers can access government guidance as required on the issues listed below via GOV.UK and other government websites but if you are unsure, please contact the Designated Safeguarding Officer:

- Bullying including cyber bullying
- Children missing education
- Child missing from home or care
- Child Sexual Exploitation
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based violence/violence against women and girls
- Hate
- Mental Health
- Missing children and adults
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting

## Adults at Risk Safeguarding Policy review (COVID 19)

Due to the Covid 19 Pandemic, since February 2020 this policy has been adapted to meet the safeguarding needs of the Trust's users.

Trust sessions and activities have been adapted to meet the needs of vulnerable adults, to ensure they can still participate. Activities have been delivered online due to government guidelines on social distancing. Therefore, safeguarding procedures and processes have been adapted to ensure all participants are able to take part free from risk or harm in virtual as well as physical settings.

Staff have been provided with the following guidance:

- Safeguarding risk assessments taking account of online delivery and working from home
- Updating and revisiting risk assessments to meet government guidelines as well as the relevant governing bodies i.e. FA and PL
- Risk assessments to be adapted when face to face delivery takes place
- New online consent forms, completed by parent/carers or staff (if the parents/carers struggle to complete the form)
- Consent form includes the safeguarding responsibilities of the Trust to service users participating
- Online consent form includes permission from parents/carers where relevant, to record online sessions to manage any safeguarding risks
- Online consent forms ensure parent/carers permission is sought for recording any sessions for safer working practices
- Audit of potential social media platforms to be carried out (staff to complete a questionnaire of any potential platforms they wish to use)
- Staff provided with guidance on the Trust Covid 19 working practices including guidelines on using social media and online platforms (social media guidelines signed off by Operations Director)
- Social media guidelines emailed, and staff have access through the Trust's SharePoint
- Welfare calls will be made to vulnerable adults risk – these will be monitored and logged. They will be escalated to local agencies if required.
- Safeguarding monitoring and tracking forms to be compiled for those most at risk, staff will support young people, vulnerable adults and update forms

## DEFINITIONS

Abuse(d)	A violation of a person's human or civil rights by another person(s) and includes Physical Abuse, Neglect, Sexual Abuse, Financial, Emotional Abuse and Bullying (and includes Harm)
Adult at Risk	The Care Act 2014 section 42 identifies 'an <b>adult</b> at risk.' An <b>adult</b> at risk of abuse or neglect is <b>defined</b> as someone who has needs for <b>care</b> and support, who is experiencing, or at risk of, abuse or neglect and as a result of their <b>care</b> needs - is unable to protect themselves.
Harm	Ill treatment (including sexual abuse) and can be non-physical or impairment of an avoidable deterioration in physical behavioural development
LADO	Local Safeguarding Designated Officer
MASH	Multi Agency Safeguarding Hub
Trust's Safeguarding Officers	Kathryn Sobczak (Designated Safeguarding Officer) Martin Bradshaw (Deputy Designated Safeguarding Officer)
Trust's Operations Director	Luke Skelhorn
Trusts CEO	Lee Doyle
Adults at Risk	Adults above 18 years old who need support to care for themselves

Category of Abuse	Physical signs	Behavioural signs
Physical Abuse	<p>Unexplained and unusual bruising, finger, strap and bite marks, injuries, cigarette burns, fractures,scalds, missing teeth.</p> <p>Injuries that a Child, Young Person or Adult at Risk with limited mobility would find difficult to get.</p>	<p>Fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, cowering, bullying or abuse of others.</p>
Neglect	<p>Constant hunger, ill- fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and inhalers.</p>	<p>Always being tired, late, absent, few friends, regularly left alone, seeks adult company or withdraws from people, stealing, no money, parent or carer not attending or interested.</p>
Sexual Abuse	<p>Genital pain, itching, bleeding, bruising, discharge, stomach pains,discomfort, pregnancy, incontinence, urinary infections or STDs, thrush,anal pain on passing motions.</p>	<p>Apparent fear of someone, nightmares, running away, age inappropriate sexually explicit knowledge or behaviour, bedwetting, eating problems, substance abuse, unexplained money or gifts, inappropriate masturbation, sexual approaches to others, sexual games with toys.</p>
<p>Bullying</p> <p>(Similar Physical and Behavioral signs for SexualExploitation)</p>	<p>Weight change, unexplained injuries and bruising, stomach and headaches, incontinence, disturbed sleep, hair pulled out.</p>	<p>Difficulty making friends, anxiety over activities/sport, truancy, withdrawn, depressed, anger, moodiness, suicide attempts, reduced performance, money or possessions reported as lost, stealing from the family, distress and anxiety on reading e-mails or texts.</p>
<p>Emotional Abuse</p> <p>(Similar Physical and Behavioural signs for Sexual Exploitation)</p>	<p>Weight change, lack of growth/development, unexplained speech disorders, self-harm, clothing inappropriate for age, gender or culture.</p>	<p>Unable to participate, fear of mistakes, fear of telling parents/carers, withdrawn, unexplained speech and language difficulties, few friends.</p>

## Important Contacts

Responsibility	Authority	Contact Details
All	Brentford FC Community Sports Trust's Safeguarding Team	Kathryn Sobczak <b>(Safeguarding Officer)</b> 07926 591 468 (work) 07533 136 524 (out of hours)  Martin Bradshaw <b>(Deputy Safeguarding Officer)</b> 07463 344062 (Work & Out of Hours)
All	Emergency Services	999
All	Football Association (FA)	FA Case Manager 0844 980 8200 x 4787
All	Premier League	Kate Singleton Safeguarding Manager 020 7864 9000 <a href="mailto:Ksingleton@premierleague.com">Ksingleton@premierleague.com</a>
All	NSPCC, Child Protection in Sport Unit	0116 234 7278 <a href="http://www.thecpsu.org.uk">www.thecpsu.org.uk</a>

Local Authority Designated Officers (LADOs)		
All	Hounslow	020 8583 5730 LADO/SAAM Duty Line <a href="mailto:LADO@hounslow.gov.uk">LADO@hounslow.gov.uk</a> Safeguarding Advisor, LADO 020 8583 4933 <a href="mailto:grace.murphy@hounslow.gov.uk">grace.murphy@hounslow.gov.uk</a>
All	Ealing	020 8825 8930 Paul Andrews / Sherwyn Sicat <a href="mailto:asv@ealing.gov.uk">asv@ealing.gov.uk</a> <a href="mailto:child.protection@ealing.cjsm.net">child.protection@ealing.cjsm.net</a>
All	Kingston & Richmond	020 8891 7370 <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a> Kingston & Richmond SPA: 020 020 8547 5008 Out of Hours: 020 8770 500
All	Hillingdon	Rob Wratten Tel: 01895 250 975 Email: <a href="mailto:rwratten@hillingdon.gov.uk">rwratten@hillingdon.gov.uk</a>

These policies and these procedures will be reviewed and updated, by the Safeguarding Sub-Group and reported to the Board of Trustees:

- annually in September;
- following a change in legislation; or
- after any serious incident;

These Policies and Procedures shall apply to all Trust activities.

All partner agencies commissioned by the Trust shall be notified of the need to comply with these Policies and Procedures.

**Document Review Date:** 03/08/2021

***Signatories***

**Marcella Phelan, Trustee**

10/20/2021 09:48 BST Phelan 10/20/2021 09:49 BST  
**Luke Skelton, Operations Director**



**13/10/2021**

**Kathryn Sobczak, Safeguarding Officer**



**13/10/2021**

**Next Review: July 2022**

## Case Management Form

\*TO BE COMPLETED AFTER SPEAKING TO A MEMBER OF THE SAFEGUARDING TEAM

Staff	
Project	
Date reported	
Name of Young Person	

Date/Time of incident or concern	Detailed description of safeguarding incident or concern	Actions taken (what did you do? Who did you speak to?)	Other agencies / professionals involved or informed (school staff, teachers, social workers, family support workers, CAMHS*)	Next Steps DSO** comments/ review

(\*) CAMHS Child and Adult Mental Health Services / (\*\*) DSO Designated Safeguarding Officer Supervision  
for BFCST staff post referral- TO BE COMPLETED BY THE SAFEGUARDING TEAM ONLY

<b>Staff wellbeing (any additional support needed)</b>	
<b>Key lessons from incident/practice or procedures</b>	
<b>Outcomes/ actions from supervision (relating to staff or organisation only)</b>	

**SSO/DSO recommendations**

Next Steps E.g. No Action, Monitor and Refer to External Agencies.

Brentford FC CST Staff member Signature: \_\_\_\_\_ Date:

.....(block capitals)

Project Manager Signature: \_\_\_\_\_ Date:

.....(block capitals)

Designated Safeguarding Officer Signature \_\_\_\_\_ Date:

.....(block capitals)

## Appendices

The Trust endorses and is committed to following:

The Football Association policies, procedures and guidelines, more fully described at:

<http://www.thefa.com/football-rules-governance/safeguarding/raising-awareness---downloads-section>

Safeguarding Children Policy	(Appendix 1)
Safeguarding Children Regulations	<b>(Appendix 2)</b>
Affiliated Football Safeguarding Policies and Procedures	<b>(Appendix 3)</b>
Including and Safeguarding Deaf and Disabled Children and Young People	<b>(Appendix 4)</b>
Respect Safeguarding Children Policy Form	<b>(Appendix 5)</b>
	<b>(Appendix 6)</b>

Premier League Safeguarding Policy **(Appendix 7)**

<https://www.premierleague.com/safeguarding>

### **BFCCST Staff Handbook**

BFCCST Professional Conduct, Page 21	<b>(Appendix 8)</b>
BFCCST Session Code of Conduct	<b>(Appendix 9)</b>
BFCCST Staff Handbook – Computers, Email, and Internet Usage, Page 17	<b>(Appendix 10)</b>
BFCCST Staff Handbook – Whistleblowing, Page 53	<b>(Appendix 11)</b>
BFCCST Data Protection Policy	<b>(Appendix 12)</b>
BFCCST Photography and Images Policy	<b>(Appendix 13)</b>
BFCCST Lost Child Policy & BFCCST Late Collection Policy	<b>(Appendix 14)</b>

BFCCST Whistleblowing Policy – Safeguarding **(Appendix 15)**

Hounslow Safeguarding Children Board - <https://www.hscb.org.uk/>

**HM Government – Working together to safeguard children:**

[Working together to safeguard children - GOV.UK \(www.gov.uk\)](http://www.gov.uk)