



## Safeguarding Adults at Risk

### Introduction

The Foundation is committed to the safeguarding of Adults at Risk within Norfolk. This policy applies to all trustees, full time staff, casual staff, volunteers and visitors whether they are paid or unpaid.

### Scope

This policy applies to Adults at Risk who experience abuse or have been subject to a crime that has been perpetrated on them by a person. The Foundation is committed to creating opportunities for an adult at risk to participate in a broad spectrum of activities at the Foundation at the same time as maintaining a safe environment for the participants. The participation of Adults at Risk may be as players, coaches, employees, volunteers, officials, administrators or spectators.

The Foundation has a moral, legal and social responsibility to provide a fun and safe environment for all those participating in these activities. The Foundation has a commitment to manage and monitor allegations of discrimination, harassment, abuse and bullying.

### Adults at Risk

An 'adult at risk' is defined as 'a person aged 18 years or over who is or may be, at risk of abuse by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself. These are sometimes referred to as 'vulnerable adults' as well. All vulnerable groups and Adults at Risk have the right to equal protection from all types of harm or abuse and have the right to protection from abuse and exploitation.

It should be recognised that there are several forms of abuse including physical, psychological, financial, sexual or neglect. These will often constitute criminal offences. In sport this may look like, but not limited to;

- An elite footballer being sent threatening and sexually explicit text messages from their coach.
- A member of a disability football team being exploited by a club member who regularly takes money from them.
- A young woman confiding in her coach about a forthcoming holiday where she will be married against her will

### Safer Structures

The safeguarding an adult at risk policy is there to react to the occasions where proactive and preventative work has failed and where harm has occurred by acts of commission or omission and where the adult at risk has not been able to safeguard his or herself.

In particular its function is to ensure that safeguards are put in place to keep the adult at risk safe and to prevent such harm occurring again, either to the same adult at risk or to other another adult at risk.

### Roles and Responsibilities

The Designated Safeguarding Officer is responsible for the Foundation's arrangements for the safeguarding of an adult at risk and the designated person to which any sign or suspicion of



# Safeguarding Adults at Risk

abuse shall be reported. This position is supported by Norwich City Football Club's Head of Safeguarding and the Foundation's Safeguarding Senior Manager.

All Foundation staff and volunteers are to safeguard the welfare of Adults at Risk by protecting them from any significant physical, sexual and emotional harm and from neglect, bullying and financial harm within the Foundation activities. This may include training and codes of practice amongst other strategies for reducing risk.

Report to the appropriate authorities any concerns about abuse or harm to Adults at Risk whether this occurs within the Foundation activities or elsewhere and whether this be a potential criminal offence or other concern. The appropriate authorities may be internal and external to football. This will include following the Foundation's reporting frameworks.

Ensure appropriate investigations and responses to concerns about abuse or harm within the Foundation utilising the staff disciplinary process as appropriate. This will include work in partnership with the Police and other statutory agencies charged with investigating and responding and with the Adult at risk who is believed to be at risk or believed to have been harmed.

Following such investigations, act to put appropriate safeguards in place to safeguard the adult at risk in the future and to reduce the risk of harm to other Adults at Risk.

Report when appropriate to the Independent Safeguarding Authority (ISA) anybody delivering a regulated activity for the Foundation who is believed by the Foundation to present a risk of harm to Adults at Risk. Where the Foundation "withdraws permission" for a person to deliver a regulated activity they will also be reported to the ISA.

The Foundation has the power as part of the Foundations staff disciplinary procedures to issue a suspension, pending a risk assessment where any one or more of the following applies:

- The individual fails to comply with any part of the Foundation's DBS and ISA Processes;
- The individual has been barred by the ISA from engaging in regulated activity relating to an adult at risk;
- The individual has been convicted of, or made the subject of caution for, a serious sexual, violent offence or any other offence that the Foundation believes to be relevant to the care of an adult at risk;
- Following a risk assessment, the Foundation is satisfied on the balance of probabilities that the individual may pose a risk of harm to an adult at Risk.

We ensure we adhere to the principles of safer recruitment as per our policy and also the guidance from Norfolk Safeguarding Children Board.

We ensure that we:

- Carefully consider the job description and person specification
- Circulate all vacancies widely.
- Prepare an information pack
- Ask for an online application form
- Define our selection criteria in the job description
- Ask for a written declaration with regards to criminal convictions, spent or otherwise
- Ask for identification



## Safeguarding Adults at Risk

- Ask for originals of any qualifications
- Conduct interviews with at least two people present
- Ask for at least two written references, including the last employer
- Gain enhanced DBS checks where current Government guidance requires us to
- Organise a comprehensive induction period which includes familiarisation with our safeguarding policies, procedures and safeguarding training through the Foundations Safer Programme.
- All staff and volunteers at the Foundation are required to complete an enhanced DBS check every 3 years. Any referrals made to DBS will be carried out by the Head of Safeguarding and recorded on My Concern.

### Definitions of Abuse

There are different types of abuse and these are:

- Physical Abuse – Including hitting, slapping, pushing, kicking, misuse of medications, restraint or inappropriate sanctions.
- Sexual Abuse – Including rape and sexual assault or sexual acts to which the person has not or could not consent and/ or was pressured into consenting.
- Psychological Abuse – Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, verbal abuse, isolation or withdrawal from supportive networks.
- Financial/Material Abuse – Including theft, fraud, exploitation, wills, property, inheritance, possessions or benefits.
- Neglect – Ignoring medical and/or physical care needs, failure to provide access to health, social care or educational services, withholding necessities of life, e.g. medication, adequate nutrition and heating
- Discriminatory – Including racist, sexist, based on a person's disability.
- Institutional - is the mistreatment or abuse or neglect of an adult by a regime or individuals within settings and services that adults live in or use, that violate the person's dignity, resulting in lack of respect for their human rights.
- Domestic - any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those
- Self-Neglect - failure of an adult to take care of himself or herself that causes or is reasonably likely to cause within a short period of time, serious physical, mental or emotional harm or substantial damage to or loss of assets.
- Modern Slavery - Modern slavery and human trafficking. Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.
- Modern day abuse - which may include but is not limited to radicalisation, female genital mutilation, child sexual exploitation, gender-based violence, sexting and trafficking.

For further information please refer to 'No Secrets' - Department of Health, 2000 Bullying – either by individuals or systemically.

At one end of a scale, there may be obvious signs and symptoms of abuse, but at the opposite end, the indicators may be very difficult to detect. Combinations of factors which individually





## Safeguarding Adults at Risk

might not give cause for concern could be much more worrying when considered together. The abuse may be committed by one individual against another or be institutional in that the whole organisation colludes in abusive practices either through ignorance or choice.

### **Where Harm May Occur**

Harm may occur anywhere in a Foundation activity or it can be reported to a Foundation representative (or indicative signs noticed) when it has occurred outside a Foundation activity.

There are complex scenarios including:

Adults at Risk playing, officiating, coaching, spectating or administering within a variety of activities at the Foundation. An adult at risk may be at risk of harm from other adults who may or may not be vulnerable themselves. Those doing harm to the adult at risk may be in the Foundation activity or elsewhere in the adult at risk network. Harm may be deliberate or result from not understanding the adult at risk needs (commission or omission).

Adults at Risk may be at risk of harming others in Foundation activities either by deliberate behaviours or by failing to understand their responsibilities to others. On these occasions the adult at risk may need help and support to manage his or her behaviour in a suitable way or may need to have certain responsibilities removed from them. Safeguards may need to be put in place to protect others.

Adults who have been 'at risk' in the past who are now 'not at risk', (example: people recovering from mental health issues). Where these adults are seeking positions of responsibility at the Foundation but have criminal records or issues from their past which are directly related to these periods of vulnerability, detailed risk assessments will be undertaken. Assessment of suitability for their new roles requires a specific knowledge base and sensitive handling.

Whilst the Foundation promote a policy of inclusion, the risk assessments are conducted to measure the risk posed by somebody who is recovering from a previous period of vulnerability, considering other an adult at risk and children who need safeguarding from possible harm, should the risk factors re-emerge.

Adults at Risk may also be at risk of harming themselves through failing to realise and report when they need additional or different support at the Foundation activities.

### **Safeguarding Training**

Every member of staff and volunteer will undertake appropriate safeguarding, first aid and DBS training every three years and receive annual refresher training through the Foundations Safer' training programme.

We actively encourage all of our staff to keep up to date with the most recent local and national adult safeguarding advice and guidance. This can be accessed via [www.norfolksafeguardingadultsboard.info](http://www.norfolksafeguardingadultsboard.info)

The Designated Safeguarding Officer should be used as a first point of contact for concerns and queries regarding any safeguarding concern and is also responsible for managing the staff risk register.



## Safeguarding Adults at Risk

### **My Concern**

The Foundation's safeguarding team alongside the Norwich City Football Club's safeguarding team currently employ the use of MyConcern. MyConcern is used to ensure the safety and protection of the participants engaging in all activities and / or programmes run by either the Foundation or the Club.

Any member of the Strategic Safeguarding Panel ("SSP") or the Safeguarding Operational Groups (from both the Foundation and the Club) has the authority to input cases onto MyConcern with as much information as possible. The SSP has delegated authority, from both Boards, to oversee and monitor the safeguarding arrangements of the organisations and ensure the final closure of any active cases on MyConcern.

The system is used to collate information regarding any safeguarding concerns that arise involving any member of staff, voluntary, casual, part-time or full-time, or participant. It will ensure collaboration between the Foundation and the Club and provide assurances to the Board of Trustees and the Club's Board of Directors that the safeguarding system is robust and withholds scrutiny from relevant external agencies. The system should complement current safeguarding policies and procedures and allow the Club's Head of Safeguarding a complete overview of both the Foundation and the Club's safeguarding practice. It will allow the Foundation and the Club to adhere to the Premier League Compliance Standards.

Whilst every member of staff in both organisations is responsible for safeguarding and may have a participant or member of staff share a disclosure with them, the only people who will have superuser access to MyConcern will be those whose position is specific safeguarding role. Superuser membership of MyConcern should include the following:

- Club's Head of Safeguarding
- Club and Foundation Senior Safeguarding Lead
- CSF Head of Operations and Business Development
- Designated Safeguarding Officers (both Foundation and Club)

This limited superuser membership is to ensure that the privacy of individual's involved is protected and to ensure that cases are not compromised if they have to go to court. In the future, general user membership (with limited access) may be rolled out to all staff.

The Club's Head of Safeguarding is responsible for ensuring that every case on MyConcern is investigated and closed off or escalated as appropriate. If the Head of Safeguarding deems escalation to external agencies is necessary, they should inform all relevant members of this decision. All safeguarding concerns raised will be uploaded to MyConcern by any superuser member but will be escalated to external agencies by the Club's Head of Safeguarding when the Premier League threshold is met. The Club's Head of Safeguarding should take the lead on all cases when the Designated Safeguarding Officers have exhausted the scope of their role and need additional support. The Club's Head of Safeguarding is responsible for closing all cases off the system; however, cases must have been discussed and evidenced by an agenda to allow for transparency and safeguarding of the position. The Designated Safeguarding Officers, for both the Foundation and the Club, as responsible for ensuring that



## Safeguarding Adults at Risk

all their cases are correctly input into the system with all relevant detail included to allow the Head of Safeguarding to investigate and action appropriately. The Foundation should be transparent with the Club regarding any safeguarding concerns to ensure that a collaborative relationship is maintained and the commitment to safeguarding is upheld. The Club should be transparent with the Foundation regarding any changes to the MyConcern system and involve the Foundation on all required training to ensure minimal operational standards are maintained. The Club should involve all relevant Foundation safeguarding staff in correspondence, additional training and learning case studies that would develop a collaborative relationship, ensure best practice is maintained and any lessons are learnt.

MyConcern is owned by the Club and the Foundation are users, thus the Club are accountable for creating reports for SSP meetings and any meetings between Foundation and Club. Staff are not required to share their MyConcern access or any information that will affect the rights or privacy of an individual or affect the integrity of any cases. Staff are required to ensure their cases are completed to the best of their knowledge and to follow up with the Club's Head of Safeguarding if their case has not been actioned within 21 days. Foundation Designated Safeguarding Officers should liaise with Club Designated Safeguarding Officers for advice and guidance when necessary to ensure best practice.

Details of the relationship between the Community Sports Foundation and Norwich City Football Club regarding the use of "My Concern".

Staff member raises concern regarding a child or adult at risk.

Concern is added to "My Concern" by one of the Designated Safeguarding Officers within the Foundation.

Relevant Designated Safeguarding Officer should liaise with Norwich City Football Clubs Designated Safeguarding Officers for advice and guidance.

Relevant Designated Safeguarding Officer should add evidence, timeline of events, statements and rationale behind decision making to My Concern

Case Reviewed and closed by Norwich City Football Clubs Head of Safeguarding.





## Safeguarding Adults at Risk

### Designated Safeguarding Officer contact details

Name	Role	Email	Telephone Number
Tom Smith	Lead Safeguarding Trustee	thomas.smith@canaries.co.uk	N/A
Gavin Coe	Senior Safeguarding Manager	gavin.coe@norwichcitycsf.org.uk	07468 417561
Lacie Pammen	Designated Safeguarding Officer	lacie.pammen@norwichcitycsf.org.uk	07799 141873
Claire Pullen	Designated Safeguarding Officer	claire.pullen@norwichcitycsf.org.uk	07468 417495
Lewis Plowman	Designated Safeguarding Officer	<a href="mailto:lewis.plowman@norwichcitycsf.org.uk">lewis.plowman@norwichcitycsf.org.uk</a>	01603 761122
Lauren Jordan	Designated Safeguarding Officer	lauren.jordan@norwichcitycsf.org.uk	01603 761122
Curtis Beales	Designated Safeguarding Officer Support	<a href="mailto:curtis.beales@norwichcitycsf.org.uk">curtis.beales@norwichcitycsf.org.uk</a>	01603 761122

### Safeguarding Process

Staff and volunteers may raise a concern about a child or adult at risk based on changes in their behaviour, marks on their body etc. A child or adult at risk may also disclose information regarding themselves or abuse they have been or are being subjected to. The Foundation has a process in place to ensure that all staff and volunteers are able to respond effectively.

Things to remember when you have a concern:

- If appropriate speak to the child or adults risk making notes of the conversation. Remember don't ask any leading questions or make any promises
- Complete the at-risk report form and contact the Designated Safeguarding Officer.
- Doing nothing is not an option

Things to remember when dealing with a disclosure:

- Listen to the child or adults risk making notes of what they say to you.
- Don't ask any leading questions or make any promises
- Explain that you must pass the information on to the relevant people so they can help
- Reassure them that they did the right thing telling you
- Call the Designated Safeguarding Officer and make them aware of the referral
- Doing nothing is not an option



## Safeguarding Adults at Risk

### At Risk Reporting

All concerns regarding a young person or an adult at risk that may be at risk should be recorded on the “At Risk” report form which every member of staff and volunteer should have on them or can access from the Foundations office.

All staff and volunteers should complete the form to the best of their knowledge, ensuring the information is legible. (Forms may be required by external agencies.) While this procedure provides a recommended approach, it is important to stress that every situation is different and should be elevated on its own unique situation.

Anybody external can now raise a concern on the website by clicking on the ‘raise a concern’ button on the safeguarding page. This will allow a report to be sent to the designated email address of [safeguarding@norwichcitycsf.org.uk](mailto:safeguarding@norwichcitycsf.org.uk). This inbox is managed by Lacie Pammen and Lauren Jordan (Designated Safeguarding Officers).

### Key Contacts

Organisation	Email / Website	Telephone Number
Norfolk Police	N/A	101
EFL Trust	N/A	01772 325940
FA Case Management Team	N/A	0845 210 8080
In an emergency	N/A	999

### External Organisations

At times the Foundation may require external organisations to deliver activities/ programmes on its behalf such as at activity centres. The Foundation ensures that those organisations have the same principles as its own with regards to safeguarding children. The Foundation always ensure that one of its representatives is present whilst the external organisation delivers to monitor this, the representative would also be responsible for raising any concerns or issues to the Designated Safeguarding Officer.

All providers of activity under the Foundation must adhere to the Foundation’s safeguarding policy. This policy is provided for Foundations of commissioned work or other providers in order to fall in line with the Foundation. Compliance to this policy is carried out by the Designated Safeguarding Officer.

### How to make a complaint

Please provide us with as much detail as you can to help us investigate your complaint:

- Say what the problem is
- What you want to happen
- Provide information on any relevant communication with us on the subject, including, for example, any reference numbers on letters or emails, and the times and dates of any conversations

### How to raise an appeal against the outcome of a Safeguarding complaint - Stage 1

- The Foundation will acknowledge the appeal within 3 working days of receipt.
- The Foundation will appoint a senior manager within The Foundation, who has not been directly involved in the assessment or decision-making process for the appellant/





## Safeguarding Adults at Risk

Foundation, and who is familiar with the relevant Foundation requirements and processes, to investigate the appeal.

- The investigation will be completed, and the appellant informed in writing of the decision within 12 working days of acknowledgement of receipt.
- If the appeal is upheld, The Foundation will take appropriate corrective action to change the decision and address any issues.

### **How to raise an appeal against the outcome of a Safeguarding complaint - Stage 2**

- The appellant or the Foundation may request that an Appeal Review Panel (ARP) is appointed to further consider the appeal. The request must be received in writing within 3 months of the notification of the outcome of the stage 1 process, after which the appeal will be closed.
- The Foundation will consist of a Chairman and two members nominated by the Chairman of the Foundation. The Foundation members shall have no commercial interest in the appeal being considered and shall not have been personally involved in any matters relating to the appeal.
- If the Foundation determines it necessary, a hearing will be held at which both the appellant and The Foundation will present their case. Experts and witnesses may also be called to attend the hearing. Any supporting documentation from the appellant must be submitted to the Chairman of the Foundation at least 5 working days ahead of the hearing.
- The Foundation will consider the evidence and make a recommendation to the Chief Executive Officer of the Foundation, within one month of the constitution of the Foundation.
- The Chief Executive Officer of the Foundation will make the final decision and inform the appellant in writing of the outcome of the appeal, within 3 working/business days of receipt of the recommendation from the Foundation and appropriate action will be taken. A copy of the Conclusions and Recommendations of the Appeal Review Panel will be provided to the appellant.
- The appellant may withdraw the appeal at any time during the process. If for any reason an appeal is withdrawn, the Foundation will not accept a future appeal on the same grounds.

### **Policy Review**

Policy Issue Date **April 2021**

Date of Next Update **April 2022**

All safeguarding policies and procedures are due for a general review on the above date. They may however be reviewed and updated earlier, in the event of a change in Foundation requirements, or relevant legislation.

This policy has been endorsed by the Chief Executive Officer and Board of Trustees.