



COMMUNITY
SPORTS
FOUNDATION

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NEST

MANAGING ALLEGATIONS

Date of Next Update: April 2024

Scope

This policy applies to all Norwich City Community Sports Foundation (“Foundation”) staff and affiliated entities to ensure a consistent standard across the Foundation, Norwich City Football Club (“Club”), Norwich City Women’s Football Club and Regional Development Programme.

This policy supersedes any previous policies on this topic prior to its issue date.

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Policy Statement

The Foundation believes that all our environments should be inclusive and welcoming for everyone and people should feel safe, valued, and respected in line with our own Foundation values. The Foundation is committed to creating a culture in which all concerns (including where the threshold for an allegation is not met) are shared responsibly with the right person and recorded and dealt with appropriately. Concerns should only be shared with those who need to know and not openly discussed.

This policy should encourage open and transparent culture and enable the Foundation to identify concerning, problematic or inappropriate behaviour at the earliest opportunity. It will ensure that individuals working for or with the Foundation are clear about professional boundaries and act in accordance with the Foundation’s Safeguarding Codes of Conduct. This policy will outline the processes to deal with such matters to minimise the risk of abuse.

It is essential that anyone make a disclosure feels confident, safe, and secure to ensure that they are given the best opportunity to have their allegation investigated thoroughly and diligently. The Foundation’s response and subsequent actions will have a direct bearing on that person’s confidence that they are being taken seriously. This confidence may be instrumental in preventing further abusive behaviour towards that individual or others.

The Foundation’s procedures will ensure that our actions are accountable and our decision-making transparent to demonstrate the highest standards of safeguarding action where practices have been found to be less safe.

Procedure

Responding to disclosures, safeguarding concerns and allegations

All disclosures, incidents and allegations must be taken seriously by the Foundation.

Doing nothing is never an option.

Staff will respond in line with the Foundation’s safeguarding policies and training as laid out in “Reporting a Safeguarding Concern”. This includes allegations about non-recent abuse and allegations made against deceased individuals.

The Foundation will fully support anyone who in good faith reports their concerns about the safety and welfare of children, young people, and adults at risk.

What is a safeguarding allegation?

An allegation is when someone who works with children or adults at risk has:

- Behaved in a way that has harmed a child or adult at risk
- Behaved in way that may has harmed a child or adult at risk
- Possibly committed a criminal offence against or related to a child or adult at risk
- Behaved in way that indicates they may be a risk to a child or adult at risk
- Behaved or may have behaved in a way that suggests they may not be suitable to work with children or adults at risk

An allegation can relate to your behaviour outside of a work, including your relationships with others.

How to respond to an allegation

The Foundation recognises that it takes extraordinary courage for someone to disclose abuse and the Foundation will ensure that appropriate action is taken to support and protect the individual making the disclosure.

Referral Thresholds

Authority	A referral happens when...
Police	A crime has been committed within the Foundation environment, call 101. A child or adult at risk is at immediate harm, call 999.
Local Authority	You have concerns about a child. Call Children Advice and Duty Services (CADS) on 0344 800 8021. You have concerns about an adult at risk. Call Adult Social Care on 0344 800 8020 <i>You will need consent from guardians of the child, if appropriate, and/or the adult at risk. You will need a reason if you do not have this. You will need the full details of the child or adult at risk, the concern including any support offered.</i>

Football Association	The concern involves football, e.g. (E)PDC programme. The FA will assess this risk and work with the Foundation.
DBS	A referral will be made when a 'relevant offence' has occurred. See further information here.
Charity Commission	When a serious incident occurs within the Charity. We report what has happened and how we are dealing with it.



Reporting Best Practice

It is important to remember the following, you must never:

- Make ambitious promises or promise secrecy
- Interrogate the discloser or push them to share more than they're willing to
- Ask leading questions
- Blame the person disclosing or give the impression they are to blame
- Approach the alleged perpetrator

You should always try and include as much information as possible when sharing information with the designated safeguarding team.

To upload a record onto the MyConcern, the designated safeguarding officer needs:

- Full names of all those involved
- Ages of all those involved
- DOBs, where possible, of all those involved

- The location of the safeguarding concern
- Information regarding the disclosure

Communication and Media

All media enquiries and communications following any safeguarding incident or about our general safeguarding provision must be approved by the Foundation's Communications and Designated Safeguarding Team to ensure investigations and identities of those involved are not compromised.

Support for Staff Dealing with Disclosures

Dealing with a disclosure or a safeguarding incident may have an impact on the wellbeing of all those involved. It is important that anyone affected seeks help if they feel that they need support.

Foundation employees have 24-hour access to the Employee Assistance Programme support line via Met Life by calling 0800 012 147 and quoting the reference 420J0464.

Volunteers and affiliated entities can contact the Operations Team for assistance with specific signposting and suggestions for accessing support.

The Charity Mind provide advice and support to anyone experiencing a mental health problem.

Infoline: 0300 123 3393

Email: info@mind.org.uk

Text: 86463

Post: Mind Infoline, PO Box 75225, London, E15 9FS

Their Infoline provides an information and signposting service which is open 9am to 6pm, Monday to Friday (except for bank holidays).

Managing an Allegation

Once an allegation has been raised the following process within the Safeguarding Team will take place. This process is the same for interns, agency staff, students, contractors etc., who are linked with the Foundation.

Initial Considerations

- Following an allegation, an initial plan should be agreed with the relevant staff considering the following:
 - Are there any immediate safety concerns for those involved?
 - Is a referral needed to Child / Adult Social Care or the Police?
 - Is it safe or necessary to share any information with the alleged perpetrator?
 - Does the alleged perpetrator need to be suspended pending investigation?
 - What further information is needed for clarification?
 - Who else knows about the allegation?
 - Do we need further advice / support from HR or the Legal team?
 - What support arrangements are needed for the alleged perpetrator and the discloser?
- If it is not a safeguarding concern, the situation should be discussed with relevant managers in line with the Foundation's disciplinary policy to see if it constitutes as poor practice or misconduct.
- If it is a safeguarding concern, the Designated Safeguarding Officer must raise with the Local Authority Designated Officer (LADO).

Action following initial considerations

- Where the allegation meets the criteria in 'What is a safeguarding allegation?', the Designated Safeguarding Officer and the LADO will discuss and agree next steps, including speaking with parents / carers of the child or adult at risk (if applicable about the allegation if they're not already aware of it).
- The LADO will:
 - Discuss the allegation further with the Designated Safeguarding Officer and obtain further details of the allegation and the circumstances in which it was made
 - Discuss whether there is evidence/information that establishes the likelihood that the allegation is false or unfounded
 - Create a strategy discussion within the procedural timelines in order to plan any actions such as police investigation and/or protective action if required
- The alleged perpetrator should be informed by an appropriate manager that an allegation has been made in writing along with the 'Managing Safeguarding Allegations Information Letter' with the additional documents identified with it sent to them.
- If a strategy discussion with social care, the authorities, or the police is required, information about an allegation must not be shared until a decision about the what information can be shared with the subject of the allegation has been made and agreed by the relevant agencies.

Allegations against Senior Management or Trustee

- If a safeguarding allegation is made against a senior manager, the Norwich City FC Head of Safeguarding must be informed and the above procedure should be followed.
- If the allegation is against the CEO or a Trustee, it is the responsibility of the chair of trustees, the safeguarding champion trustee and the CEO to agree an initial plan of how to proceed. If one of them is the subject of the allegation their place will be taken by the vice-chair of trustees or another trustee respectively
- A designated safeguarding officer or the Norwich City FC Head of Safeguarding will confirm if it is a safeguarding allegation
- The same process above will be followed.

Suspension

- The Foundation may in some cases decide to suspend the person who is the subject of the allegation or cease to use the services of a volunteer on a temporary basis.
- The act of suspension **does not** indicate guilt, it is a neutral act. An allegation must not result in automatic suspension and should be carefully thought out.
- It should be considered in any case where:
 - A child is at risk of significant harm or the allegation warrants a police investigation
 - Allegation is so serious that if substantiated there might be grounds for dismissal
 - The subject of the allegations may interfere with a witness
 - Continuing normal duties may pose a risk to others and it cannot be mitigated

Action following the conclusion of the external investigative process

- At the end of any external investigations, the Safeguarding Team and the LADO will formally review the outcome and determine further actions.
- Following the completion of internal investigations, the Safeguarding Team will complete a report with relevant information, actions and recommendations
- HR or the relevant line manager of the staff member / volunteer will need to be made aware to any decision (see Appendix B for further information)
- Every effort should be made to reach a conclusion in all cases even if:
 - Individual(s) refuse to cooperate; all should be given full opportunity to engage, answer the allegation and make representations
 - It is difficult to reach a conclusion
 - The staff member is no longer employed or the volunteer has withdrawn their services
- The subject of the allegation must receive written feedback clarifying the outcome and any implications on their employment / volunteering.

Definitions on Recording an Outcome

1. **Substantiated:** There is sufficient evidence to prove the allegation
2. **False:** There is sufficient evidence to disprove the allegation
3. **Malicious:** There is clear evidence to prove that there has been a deliberate act to deceive, and the allegation is entirely false
4. **Unfounded:** There is no evidence or proper basis that supports the allegation being made. This may be that the discloser misinterpreted the situation, was mistaken about what they saw, or may not have been aware of all the circumstances
5. **Unsubstantiated:** This is not the same as a false allegation. It means that there is insufficient evidence to prove the alleged behaviour occurred.

Unfounded or Malicious Allegations

If an allegation is determined to be unfounded or malicious, the Safeguarding Team must consider if any further action is required. This should consider:

- If the safeguarding allegation was made by a child. It may be that a referral is needed to Children's Services to determine if the child is in need of services or may have been abused by someone else

- If the safeguarding allegation was deliberately invented or raised maliciously by an adult, advice should be sought with the Police
- Whether the discloser was a member of staff and if disciplinary action is required
- The support needs of the person who was the subject of the safeguarding allegation

Associated Policies

Speak Up Policy

Safeguarding Code of Conduct

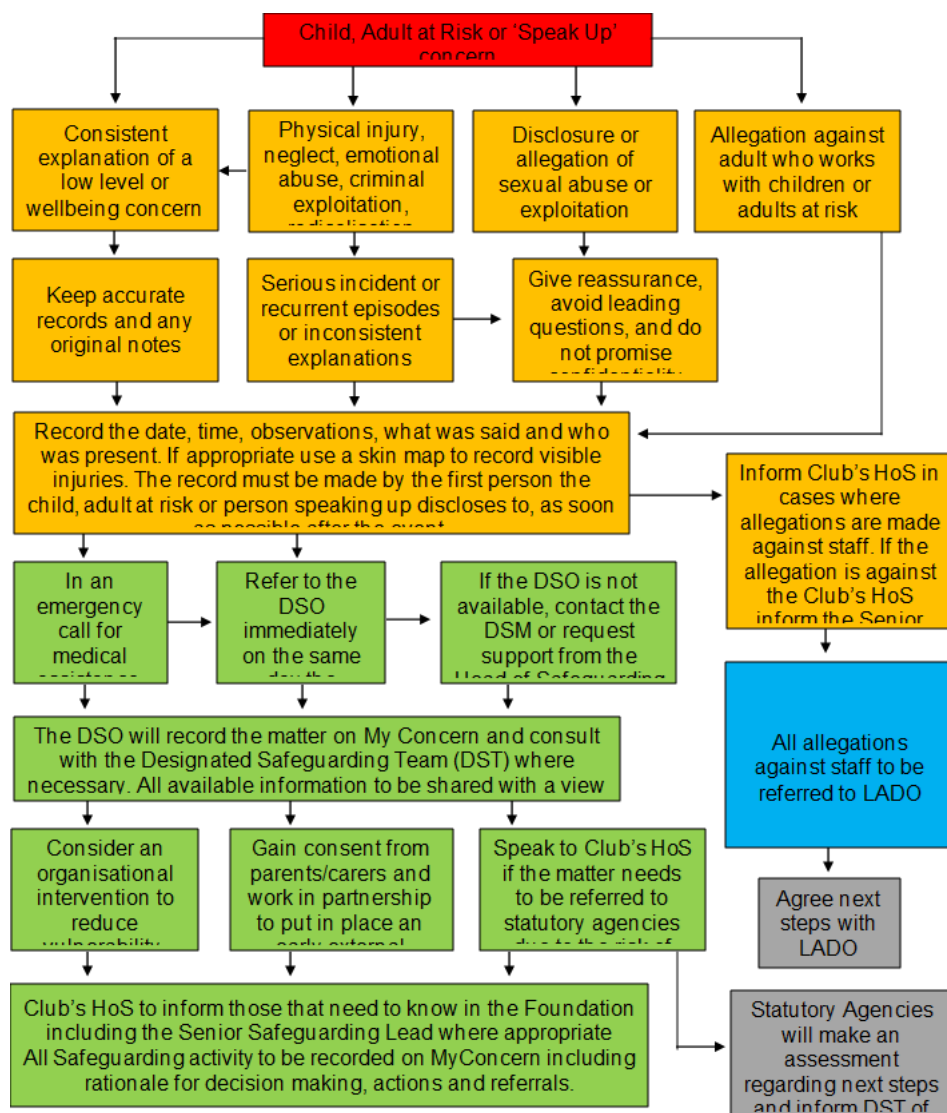
Information Sharing

Low Level Concerns

Policy Issue Date: April 2023

Date of Next Update: April 2024

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Foundation requirements, or relevant legislation.



Appendix B – Further Information for Managing an Allegation

Following the conclusion of an external investigative process:

There are several options that may follow the external investigative process:

- Reintegration of the staff member or volunteer
- Performance management or capability processes is put in place
- Disciplinary process is started in line with the Disciplinary policy
- Referral to the DBS
- Referral to any relevant professional / regulatory bodies on the grounds of misconduct

Support Options:

Support will need to be negotiated and agreed on a case-by-case basis.

The safeguarding team is responsible for ensuring that the staff member or volunteer who is the subject of the allegation is:

- Informed of the allegation against them (once agreed by all relevant agencies) and notified of the processes
- Signposted to independent support if required, e.g., the Employee Assistance Programme
- Kept up to date about any progress in relation to their case
- Advise to contact any relevant representation
- Informed of arranged to them updated about developments in the workplace in the case of suspension
- Sent correspondence confirming the above, including support arrangements