



## POLICY AUDIT INFORMATION: SAFEGUARDING POLICY

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## HARTLEPOOL UNITED FOOTBALL CLUB ACADEMY

### SAFEGUARDING POLICY

#### Contents

Statement of intent.....	5
1. Definitions .....	6
2. Legal framework .....	7
3. Roles and responsibilities .....	9
4. Inter-agency working.....	13
5. Abuse and neglect .....	14
6. What is abuse? .....	15
7. Types of abuse and neglect.....	15
8. Reporting and investigating abuse .....	16
9. Maintaining records .....	17
10. Disciplinary action .....	17
11. Duty of disclosure.....	17
12. Additional support and guidance .....	17
13. Supervision .....	17
14. Preventing radicalisation .....	21
15. Concerns about staff members and safeguarding practices .....	27
16. Online safety .....	27
17. Mobile phone and camera safety .....	27
18. Sports clubs and extracurricular activities.....	29
19. Safer recruitment .....	30
20. Single central record (SCR) .....	34
21. Staff suitability.....	34



22.	Training.....	34
<b>Child protection and Safeguarding .....</b>		<b>36</b>
23.	FGM .....	36
24.	Forced marriage .....	38
25.	Child sexual exploitation (CSE) .....	39
26.	Homelessness.....	41
27.	County lines criminal activity.....	42
28.	Serious violence.....	45
29.	Attendees with family members in prison .....	47
30.	Attendees required to give evidence in court.....	47
31.	Contextual safeguarding .....	48
32.	A child missing from the Club.....	48
33.	Attendees with SEND .....	51
34.	Alternative provision .....	51
35.	Private fostering .....	51
36.	Concerns about an attendee .....	52
37.	Early help.....	53
38.	Managing referrals .....	54
39.	Dealing with allegations of abuse against staff .....	55
40.	Allegations of abuse against other attendees (peer-on-peer abuse) .....	55
41.	Communication and confidentiality .....	66
<b>Vulnerable Adults and Safeguarding.....</b>		<b>69</b>
42.	Recognising the Signs and Suspicions of Abuse in Vulnerable Adults.....	69
43.	Procedure for Responding to, Recording and Reporting Actual or Suspected Adult Abuse...	75
44.	Procedure for Dealing with an Allegation made against an Employee or Volunteer .....	78
45.	Procedure for Assessing and Managing Risks in the Safeguarding of Vulnerable Adults .....	81



46.	Procedure for Recording Reporting and Reviewing Accidents, Incidents and Near Misses ..	88
47.	Code of Behaviour when Working with Vulnerable Adults.....	89
48.	E-Safety Policy .....	63
49.	Monitoring and review.....	93

## Appendices

- a) Staff Disqualification Declaration
- b) Safeguarding Reporting Process
- c) Contacts and Advice
- d) Recording & Reporting Concerns, Disclosures & Allegations or Suspicions of Abuse
- e) Reporting, Recording and Reviewing Accidents, Incidents and Near Misses
- f) Essential HUFC Service User Information
- g) E-Safety Agreement for Use with Vulnerable Adults
- h) Contact Details for HUFC's Vulnerable Adults Safeguarding Responsibilities
- i) Contact Details for Child Protection and Safeguarding Responsibilities



## **Safeguarding**

### **Statement of intent**

Hartlepool United FC is committed to safeguarding and promoting the welfare, both physical and emotional, of every attendee both inside and outside of the club premises. We implement a whole-club preventative approach to managing safeguarding concerns, ensuring that the wellbeing of attendees is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject, or identify people who might pose a risk to children.
- Teaching attendees how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any attendee that has been subject to abuse.
- Ensuring that members of the board of directors, the Manager and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns to the DSO.
- Ensuring that the Manager and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.



Signed by:

Chairman

Date:

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Safeguarding Senior  
Manager

Date:

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## 1. Definitions

1.1 The terms **“children”** and **“child”** refer to anyone under the age of 18.

The term **“vulnerable adult”** refers to all persons over the age of 18.

1.2 For the purposes of this policy, “safeguarding and protecting the welfare of children and vulnerable adults” is defined as:

- Protecting attendees from maltreatment.
- Preventing the impairment of attendees’ health or development.
- Ensuring that attendees grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all attendees to have the best outcomes.

1.3 For the purposes of this policy, the term **“harmful sexual behaviour”** includes, but is not limited to, the following actions:



- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

- 1.4 In accordance with the DfE's guidance, 'Sexual violence and sexual harassment between children in clubs and colleges' (2018 – Updated Sept 2021 in line with KCSI 2021) - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/97821/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges.pdf), and for the purposes of this policy, the term **“sexual harassment”** is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.
- 1.5 For this policy, the term **“sexual violence”** encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.
- 1.6 For the purposes of this policy, **“upskirting”** refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both attendees and staff), and any gender, can be a victim of upskirting.
- 1.7 The term **“teaching role”** is defined as planning and preparing lessons and courses for attendees; delivering lessons to attendees; assessing the development, progress, and attainment of attendees; and reporting on the development, progress, and attainment of attendees. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified member of staff or other person nominated by the Manager to provide such direction and supervision.

## 2. Legal framework

- 2.1 This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

### Legislation

Children Act 1989 - [Children Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/41/contents/enacted)

Children Act 2004 - [Children Act 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2004/31/contents/enacted)



Safeguarding Vulnerable Groups Act 2006 - [Safeguarding Vulnerable Groups Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/16/section/1)

The Education (Club Staff' Appraisal) (England) Regulations 2012 (as amended)

Sexual Offences Act 2003 - [Sexual Offences Act 2003 \(Notification Requirements\) \(England and Wales\) Regulations 2012 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/sexual-offences-act-2003-notification-requirements)

The General Data Protection Regulation (GDPR) -

Data Protection Act 2018 - [Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/data-protection-act-2018)

Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 - [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukreg/2018/1100/made)

Voyeurism (Offences) Act 2019 - [Voyeurism \(Offences\) Act 2019 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2019/16/section/1)

### **Statutory guidance**

HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage' – last updated July 2022 - [Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible-version)

DfE (2018) 'Working Together to Safeguard Children' – last updated July 2022 - [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/working-together-to-safeguard-children)

DfE (2015) 'The Prevent duty' - [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/prevent-duty-guidance-for-england-and-wales)

DfE (2022) 'Keeping children safe in education' - [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/keeping-children-safe-in-education)

DfE (2018) 'Disqualification under the Childcare Act 2006' last updated August 2018 - [Disqualification under the Childcare Act 2006 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/disqualification-under-the-childcare-act-2006)

### **Non-statutory guidance**





DfE (2015) 'What to do if you're worried a child is being abused' - [Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/child-abuse-concerns-guide-for-practitioners)

DfE (2018) 'Information sharing' - [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/information-sharing-advice-for-safeguarding-practitioners)

DfE (2017) 'Child sexual exploitation' - [Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/child-sexual-exploitation-definition-and-guide-for-practitioners)

DfE (2018) 'Sexual violence and sexual harassment between children in clubs and colleges' last updated 2021. -[\[Withdrawn in September 2022\] Sexual violence and sexual harassment between children in schools and colleges - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges) – Guidance can be found in [Keeping Children Safe in Education 2022](#)

DfE (2020) [Sharing Nudes and Semi nudes - Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

## 2.2 Other relevant club policies include:

[\*\*Data Protection Policy\*\*](#)

[\*\*Whistleblowing Policy\*\*](#)

[\*\*Anti-Bullying Policy\*\*](#)

[\*\*Privacy Notice\*\*](#)

## 3. Roles and responsibilities

### 3.1 The Club Board has a duty to:

- Ensure that the club complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures, and training opportunities in the club are effective and always comply with the law.
- Guarantee that the club contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the club's safeguarding arrangements consider the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the club's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

- Ensure that staff members have due regard to relevant data protection principles which allow them to share personal information.
- Ensure that a member of the board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Manager or another member of the Board.
- Guarantee that there are effective child protection policies and procedures in place together with a Staff Code of Conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a Senior Safeguarding Manager in the role as an explicit part of the role-holder's job description.
- Appoint a Designated Safeguarding Officer DSO(s) to provide support to the SSO and ensure that they are trained to the same standard as the SSO, and that the role is explicit in their job description(s).
- Ensure all relevant persons are aware of the club's local safeguarding arrangements, including the board of directors itself, and DSO.
- Make sure that attendees are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities.
- Adhere to statutory responsibilities by conducting preemployment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support attendees to be themselves at club, e.g., if they are LGBTQ+.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails, and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle attendees' allegations against other attendees.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of attendees and staff.

- Ensure that procedures are in place to eliminate unlawful discrimination, harassment, and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that attendees' wishes, and feelings are considered when determining what action to take and what services to provide to protect individual attendees.
- Guarantee that there are systems in place for attendees to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the attendee's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for attendees who go missing from the club, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

### 3.2 The **Senior Safeguarding Manager** has a duty to:

- Safeguard attendees' wellbeing and maintain public trust in the profession.
- Ensure that the policies and procedures adopted by the board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, safety training, and the identity of the DSO and any deputies.

### 3.3 The **DSO** has a duty to:

- Understand and keep up to date with local safeguarding arrangements.
- Act as the main point of contact with the three safeguarding partners.
- Make the necessary child protection referrals to appropriate agencies.
- Liaise with the Safeguarding Senior Manager to inform them of safeguarding issues and ongoing enquiries.
- Liaise with the SSM to ensure effective safeguarding outcomes.

- Act as a source of support, advice, and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Understand the assessment process for providing early help and intervention.
- Support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate.
- Keep cases of early help under constant review and refer them to the CSCS if the situation does not appear to be improving.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the club's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Be alert to the specific requirements of children in need, including those with SEND and young carers.
- Keep detailed, accurate and secure records of concerns and referrals.
- Secure access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the board of directors to ensure the club's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.
- Ensure the club's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the club may make referrals for suspected cases of abuse or neglect, as well as the role the club plays in these referrals.
- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.

- Be always available during club hours to discuss any safeguarding concerns. NB. The club will determine what “available” means, e.g., it may be appropriate to be accessible by electronic means such as phone or Skype/Zoom/Teams.
- Hold the details of the LA personal advisor and liaise with them as necessary.

#### 3.4 **Other staff members** have a responsibility to:

- Safeguard attendees’ wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which attendees can learn.
- Act in accordance with club procedures with the aim of eliminating unlawful discrimination, harassment, and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of ‘it could happen here’ where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Be aware of and understand the procedure to follow if a child confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSO.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Challenge senior leaders over any safeguarding concerns, where necessary.

## 4. **Inter-agency working**

- 4.1 The club contributes to inter-agency working as part of its statutory duty.
- 4.2 The club is aware of and will follow the local safeguarding arrangements.

- 4.3 The club will work with CSCS, the police, health services and other services to protect the welfare of its attendees, through the early help process and by contributing to inter-agency plans to provide additional support.
- 4.4 Where a need for early help is identified, the club will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
- 4.5 The club recognises the importance of proactive information sharing between professionals and local agencies to effectively meet attendees' needs and identify any need for early help.
- 4.6 Considering 4.3, staff members are aware that whilst the GDPR and the Data Protection Act 2018 place a duty on clubs to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the attendee being placed at risk of harm.
- 4.7 Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of attendees.
- 4.8 If staff members are in doubt about sharing information, they will speak to the DSO or deputy DSO.
- 4.9 The club also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

## 5. Abuse and neglect

- 5.1 All members of staff will be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.
- 5.2 All staff members will be aware of the indicators of abuse and the appropriate action to take following an attendee being identified as at potential risk of abuse or neglect.
- 5.3 When identifying attendees at risk of potential harm, staff members will look out for several indicators including, but not limited to, the following:
  - Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
  - Lack of concentration and acting withdrawn
  - Knowledge ahead of their age, e.g., sexual knowledge.
  - Use of explicit language
  - Fear of abandonment
  - Depression and low self-esteem

- 5.4 All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults, and sexting.
- 5.5 All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in section 40 of this policy.
- 5.6 All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy, and sexting, and will understand that these put attendees in danger.
- 5.7 Staff members will be aware of the effects of an attendee witnessing an incident of abuse, such as witnessing domestic violence at home.

## 6. What is abuse?

- 6.1 Given the risk of abuse to children and service users, all employees are required to be always alert to the possibility of abuse towards children or service users.
- 6.2 Abuse may be a single incident or something that occurs over a long period of time. It can take many forms including, but not limited to:
  - financial or material abuse
  - physical abuse
  - mental abuse
  - neglect and failures to act
  - sexual abuse
  - threats of abuse or harm
  - controlling or intimidating conduct
  - self-neglect
  - domestic abuse
  - poor practices within an organisation providing care
  - modern slavery.
- 6.3 The abuse may come from employees, personal assistants, service users, relatives, neighbours, social workers, providers of support services etc.

## 7. Types of abuse and neglect

- 7.1 **Abuse:** A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g., via the internet.
- 7.2 **Physical abuse:** A form of abuse which may involve actions such as hitting, throwing, burning, drowning, and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

- 7.3 **Emotional abuse:** A form of abuse which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.
- 7.4 **Sexual abuse:** A form of abuse which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.
- 7.5 **Neglect:** A form of abuse which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.
- 8. Reporting and investigating abuse**
- 8.1 Hartlepool United FC will treat all complaints, allegations, or suspicions of abuse with the utmost seriousness. Training will be provided, as appropriate, to ensure that staff are aware of the warning signs of abuse and the correct reporting procedure to follow if they suspect abuse is, or has, taken place.
- 8.2 Employees that suspect abuse is occurring should refer the matter to the DSO immediately, with as much detail as possible. The DSO will need to be informed of the names of the people involved (if known), what type of abuse is or may be occurring, and the dates and times this occurred (if known). An official written report of the alleged act may be requested at this stage as part of the evidence gathering procedure.
- 8.3 Employees may be asked to refrain from discussing alleged abuse with fellow colleagues, other than those specified by the DSO, to avoid the spread of potentially harmful misinformation and to protect the validity of any investigation.
- 8.4 The allegations will be investigated fully, and all such reports are taken seriously. The investigation will be conducted in a discrete and timely manner and will involve the collation of evidence typically derived from witness statements and surveillance footage where possible.
- 8.5 If it is suspected that a criminal act may have been committed, the Club will report the situation to the police.
- 8.6 Employees suspected of abuse will be suspended on full pay pending a full investigation of the complaints. It should be noted that this suspension is not an indication of the employee's guilt, but rather a necessity given the circumstances. The Club appreciates the impact prolonged suspension can have on an employee's reputation, even when allegations are later found to be incorrect, and does not take the decision to suspend lightly.



- 8.7 Hartlepool United FC may be under a duty to disclose allegations of abuse to the Disclosure and Barring Service or Disclosure Scotland as appropriate. The organisation may also consider it necessary to inform the police of allegations under investigation.

## **9. Maintaining records**

- 9.1 Hartlepool United FC will ensure that all details associated with allegation of abuse are recorded clearly and accurately. The records will be maintained securely in line with the Club's confidential record keeping procedure as detailed in the Data Protection Policy (Employee Handbook and the Privacy Notice).

## **10. Disciplinary action**

- 10.1 If the investigation reveals that abuse has happened, or is happening, the Club will set up a disciplinary hearing for the employee concerned. Abuse of service users is regarded by the Club as an act of gross misconduct and the allegation could result in summary dismissal, in line with the Club's disciplinary procedure.
- 10.2 Employees will have the chance to appeal any disciplinary action that is taken against them.

## **11. Duty of disclosure**

- 11.1 Hartlepool United FC is legally required to send information to the Disclosure and Barring Service or Disclosure Scotland if a decision is taken to dismiss an employee or remove them from working in regulated activity/work.
- 11.2 Hartlepool United FC may also be required to inform the Disclosure and Barring Service or Disclosure Scotland if the Club suspends an employee, or an employee resigns in suspicious circumstances, as the referral duty criteria may already be met at that stage.

## **12. Additional support and guidance**

- 12.1 Employees who wish for further information on safeguarding are encouraged to contact the DSO or relevant HR representative. The Club will endeavour to provide up to date support and guidance to all staff when it comes to safeguarding and their duty to protect service users from harm. Relevant supporting material is also readily available online and the Club will look to furnish employees with this where requested.

## **13. Supervision**

- 13.2 Hartlepool United FC recognises the need for regular and effective supervision of its employees to ensure that they feel well supported and motivated in their work; that the Club is delivering quality services to the people that use its services and that the organisation can function effectively.
- 13.3 Purpose of Supervision: This is an opportunity to review an employee's work program, to monitor their progress and to review the direction of their work. Supervision is also an opportunity to identify any gaps in skills and training, with a focus on enhancing professional development. Just as importantly, the employee's successes and achievements in their work can also be identified and celebrated. Supervision is also a place where an employee can be challenged supportively and

constructively within mutually agreed and accepted boundaries. Issues relating to the workplace and to working practices can be identified and discussed. Supervision is an ideal opportunity to demonstrate that the employee is a valued member of the team at Hartlepool United FC and offers them a chance to ensure that their emotional well-being is considered and that their personal development needs are being met. During the session, the employee will be able to 'offload' their concerns and have these discussed in a supportive environment. In summary, the purpose of supervision includes:

- Review of work programme
- A place to be challenged, supportively and constructively
- Issues related to the workplace are addressed
- A place to identify skills gaps and training needs - professional development
- Employee's experiences are valued
- Working practices are discussed
- Achievements are identified and celebrated
- Work progress is monitored, and direction is reviewed
- Emotional well-being/work-life balance and a place for personal development
- Mutually agreed and acceptable boundaries
- A place to offload

13.4 What the employee can expect from supervision: This is an opportunity for the employee to review their current workload with their line manager and discuss future work and agree on targets. The line manager will acknowledge the work that the employee is responsible for and offer praise and constructive feedback where appropriate. Support and guidance can also be offered where necessary. This is also a time when the line manager can challenge the employee appropriately and address actions and anticipated follow-up relating to these. Training needs will also be identified during the meeting and notes will be made by the line manager and copied to the employee which will serve as a record to refer to at the next supervision. Employees should feel able to raise any issues or concerns, both related to work and personal things unrelated to work. In summary, the employee can expect the following from supervision:

- A place where guidance is received
- To be challenged appropriately by their line manager
- A place to address actions and follow up
- That notes and records of the supervision are made and stored/copied
- An assessment of training needs is made
- Support is offered
- That their supervisor understands their work and workload
- Acknowledgement and praise are received
- Work is discussed and targets agreed

- A place where personal things (including those that are not work related) can be discussed if the employee so desires
- A place to talk about any concerns and issues

**13.5 Frequency of supervision:** Frequency and length of supervision is expected to be in line with the following minimums:

Full time and part time employees should receive supervision no less than once every six months for a minimum of 60 minutes.

Any supervisory sessions must be re-booked for as soon as possible after the missed sessions to maintain the minimum regularity set out above.

**13.6 Location of supervision:** Supervision should take place in a private and uninterrupted space during the employees scheduled working day.

**13.7 Recording supervision sessions:** It is the line manager's responsibility to take notes and ensure that the employee receives a copy and that a copy goes on file. Both the line manager and the employee must agree and sign a final copy of the supervision records, which will then be kept in individual supervision files in a secure place. After six months, supervision notes should be archived and held in the employees HR folder for six years.

**13.8 Records will be made in a manner that works for each line manager;** however, a summary action sheet will be completed during or immediately after each session. It is important that any agreed actions are given to a named person and that the line manager ensures that actions are reviewed & agreements followed up - with negotiation around timescales & outcomes where necessary - in future sessions.

**13.9 Access to supervision sessions:** Should the line manager with responsibility for supervision of an employee leave, they are required to provide access - to the person taking over responsibility for that employee's future supervision - to six months of previous supervision notes.

**13.10 Confidentiality:** There will be three levels relating to the need to breach confidentiality within supervision as set out below. This explanation is provided so that all employees receiving supervision within their employment at Hartlepool United are clear about what can and cannot remain confidential:

Issues	Level
<ul style="list-style-type: none"> <li>▪ If the behavior or activities which bring Hartlepool United FC into disrepute</li> <li>▪ If it is about harm to self and/or others</li> <li>▪ If it involves illegal activity - depending on currency and severity of activity</li> <li>▪ If it concerns actions of gross misconduct</li> <li>▪ If it concerns activities where safeguarding policies apply</li> </ul>	<ul style="list-style-type: none"> <li>▪ There is a duty as a line manager to report/action via Hartlepool United FC's most senior person responsible for HR &amp; appropriate public authorities - where appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>▪ If it concerns activities that may lead to disciplinary action being taken</li> <li>▪ If it concerns actions relating to performance or Capability</li> </ul>	<ul style="list-style-type: none"> <li>▪ Items may need to be reported via line management structures to Hartlepool United FC's most senior person responsible for HR.</li> </ul>
<ul style="list-style-type: none"> <li>▪ If the information given by the employee will have significant impact on Hartlepool United FC e.g., long term sickness</li> </ul>	<ul style="list-style-type: none"> <li>▪ Items may need to be reported through the line management structure and to Hartlepool United FC's most senior person responsible for HR.</li> </ul>

#### 14. Preventing radicalisation

- 14.1 To this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies.
- 14.2 Protecting children from the risk of radicalisation is part of the club’s wider safeguarding duties.
- 14.3 The club will actively assess the risk of attendees being drawn into terrorism.
- 14.4 Staff will be alert to changes in attendees’ behaviour which could indicate that they may need help or protection.
- 14.5 Staff will use their professional judgement to identify attendees who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The club will work with local safeguarding arrangements as appropriate.
- 14.6 The club will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the club will assist and advise family members who raise concerns and provide information for support mechanisms.
- 14.7 Any concerns over radicalisation will be discussed with a child’s parents, unless the club has reason to believe that the child would be placed at risk as a result.

#### **Training**

- 14.8 The DSO will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSO will arrange formal training sessions with the ‘Counter Terrorism ‘Police’ for all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

#### **Risk indicators of vulnerable attendees**

- 14.9 Indicators of an identity crisis include the following:
- Distancing themselves from their cultural/religious heritage
  - Uncomfortable with their place in society
- 14.10 Indicators of a personal crisis include the following:
- Family tensions
  - A sense of isolation
  - Low self-esteem
  - Disassociation from existing friendship groups
  - Searching for answers to questions about identity, faith and belonging
- 14.11 Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

14.12 Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

### **Making a judgement**

14.13 When making a judgement, staff will ask themselves the following questions:

- Does the attendee have access to extremist influences?
- Does the attendee access the internet for the purposes of extremist activities (e.g., using closed network groups, accessing, or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the attendee has been, or is likely to be, involved with extremist organisations?
- Is the attendee known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the attendee sympathise with or support illegal/illicit groups?
- Does the attendee support group with links to extremist activity?
- Has the attendee encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political, or religious influence on the attendee?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the attendee?
- Has there been a significant shift in the attendee's outward appearance that suggests a new social, political, or religious influence?
- Has the attendee come into conflict with family over religious beliefs, lifestyle, or dress choices?
- Does the attendee vocally support terrorist attacks, either verbally or in their written work?
- Has the attendee witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the attendee travelled for extended periods of time to international locations?

- Has the attendee employed any methods to disguise their identity?
- Does the attendee have experience of poverty, disadvantage, discrimination, or social exclusion?
- Does the attendee display a lack of affinity or understanding for others?
- Is the attendee the victim of social isolation?
- Does the attendee demonstrate a simplistic or flawed understanding of religion or politics?
- Is the attendee a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the attendee have insecure, conflicted, or absent family relationships?
- Has the attendee experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the attendee's life has extremist views or sympathies?

14.14 Critical indicators include where the attendee is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

14.15 Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSO.

14.16 The DSO will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

#### **Channel programme**

14.17 Safeguarding children is a key role for both the club and the LA, which is implemented using the Channel programme. This service shall be used where a vulnerable attendee is at risk of being involved in terrorist activities.

14.18 In cases where the club believes an attendee is potentially at serious risk of being radicalised, the SSM or DSO will contact the Channel programme.

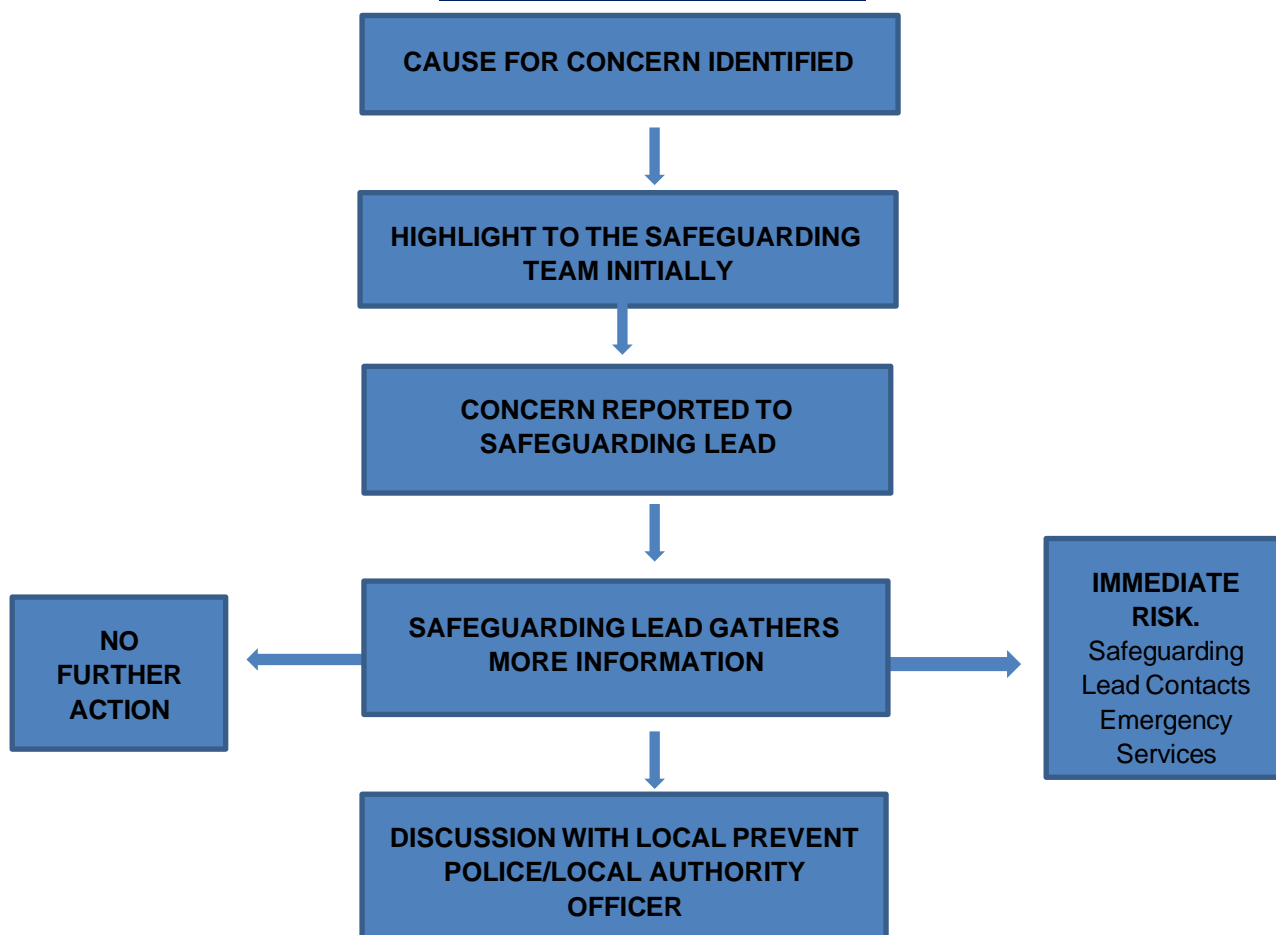
14.19 The DSO will also support any staff making referrals to the Channel programme.

- 14.20 The Channel programme ensures that vulnerable children and adults of any faith, ethnicity, or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.
- 14.21 The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the club.
- 14.22 The delivery of the Channel programme may often overlap with the implementation of the LA's or club's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

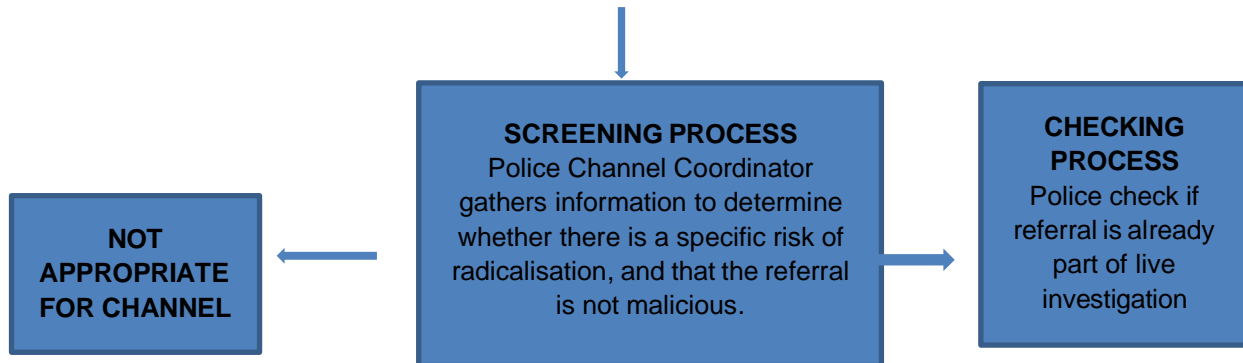
### Channel Referral

Staff should use their professional judgement and discuss with a Designated Safeguarding Person if they have any concerns. Once assessed, and if appropriate, this will be referred to the Channel panel.

#### Channel Referral Process Flowchart







### Extremist speakers

- 14.23 The **Club** will prevent speakers who may promote extremist views from using the club premises.

### Building resilience

- 14.24 The club will:
- Allow attendees time to explore sensitive and controversial issues.
  - Provide attendees with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices, and recognise where pressure from others threatens their personal safety and wellbeing.
  - Equip attendees to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
  - Teach attendees about mutual respect and understanding for the diverse national, regional, religious, and ethnic identities of the UK.

### Resources

- 14.25 The club will utilise the following resources when preventing radicalisation:
- Local safeguarding arrangements
  - Local police (contacted via 101 for non-emergencies)
  - The DfE's dedicated helpline (020 7340 7264)
  - The Channel awareness programme
  - The Educate Against Hate website



Statutory guidance; Revised **Prevent duty guidance: for England and Wales** Updated 1 April 2021

[Prevent duty guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevent-duty-guidance)

Protect Duty consultation document

Updated 27 January 2022

[Protect Duty consultation document \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/protect-duty-consultation-document)

**15. Concerns about staff members and safeguarding practices**

- 15.1 If a staff member has concerns about another member of staff, it will be raised with the Manager.
- 15.2 If the concern is with regards to the Manager, it will be referred to the Board.
- 15.3 Any concerns regarding the safeguarding practices at the club will be raised with the SSM/DSO, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.
- 15.4 If a staff member feels unable to raise an issue with the SSMr, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

**16. Online safety**

- 16.1 All attendees will be made aware of online risks and taught how to stay safe online.
- 16.2 Through training, all staff members will be made aware of the following:
  - Attendee attitudes and behaviours which may indicate they are at risk of potential harm online
  - The procedure to follow when they have a concern regarding an attendee's online activity
- 16.3 The use of mobile phones by staff and attendees is closely monitored by the club, in accordance with the Photography Policy.
- 16.4 The club will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what attendees can be taught regarding online teaching.

**17. Mobile phone and camera safety**

- 17.1 Staff members will not use personal mobile phones or cameras when attendees are present.
- 17.2 Staff may use mobile phones on club premises outside of working hours when no attendees are present.
- 17.3 Staff may use mobile phones in the staffroom during breaks and non-contact time.
- 17.4 Mobile phones will be safely stored and in silent mode whilst attendees are present.
- 17.5 Staff will use their professional judgement in emergency situations. Do we have a consent form?
- 17.6 Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when attendees are present.
- 17.7 Mobile devices will not be used to take images or videos of attendees or staff in any circumstances.
- 17.8 The sending of inappropriate messages or images from mobile devices is strictly prohibited.

- 17.9 Staff who do not adhere to this policy will face disciplinary action.
- 17.10 **ICT technicians** and the **e-safety officer** will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission from an **ICT technician** or the **e-safety officer**.
- 17.11 Photographs and videos of attendees will be carefully planned before any activity about consent and adhering to the club's **Data Protection Policy**.
- 17.12 The DSO will oversee the planning of any events where photographs and videos will be taken.
- 17.13 Where photographs and videos will involve LAC attendees, adopted attendees, or attendees for whom there are security concerns, the **SMM** will liaise with the **DSO** to determine the steps involved.
- 17.14 The DSO will, in known cases of an attendee who is a LAC or who has been adopted, liaise with the attendee's social worker, carers or adoptive parents to assess the needs and risks associated with the attendee.
- 17.15 The club will always adhere to its Photography Policy.
- 17.16 Staff will report any concerns about another staff member's use of mobile phones to the DSO, following the procedures outlined in the Child Protection and Safeguarding Policy.

#### **Up skirting**

- 17.17 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.
- 17.18 A "specified purpose" is namely:
- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks, or underwear).
  - To humiliate, distress or alarm the victim.
- 17.19 "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g., a motion activated camera.
- 17.20 Up skirting will not be tolerated by the club.
- 17.21 Any incidents of up skirting will be reported to the **DSO** who will then decide on the next steps to take, which may include police involvement.

New links added

**Upskirting: Know your rights** - Published 11 February 2019 - [Upskirting: know your rights - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/upskirting-know-your-rights)

**Stalking Protection Act: statutory guidance for the police** - Published 20th January 2020 Last updated 18 January 2021

[Stalking Protection Act: statutory guidance for the police - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/stalking-protection-act-statutory-guidance-for-the-police)

**18. Sports clubs and extracurricular activities**

- 18.1 Clubs and extracurricular activities hosted by external bodies, e.g., charities or companies, will work in collaboration with the club to effectively safeguard attendees and adhere to local safeguarding arrangements.
- 18.2 Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of attendees.
- 18.3 Paid and volunteer staff understand how they should respond to child and vulnerable adults' protection concerns and how to make a referral to CSCS or the police, if necessary.
- 18.4 All national governing bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## **19. Safer recruitment**

- 19.1 An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be in 'regulated activity' if, because of their work, they:
- Are responsible daily for the care or supervision of children.
  - Regularly work in the club at times when children are on the premises.
  - Regularly meet children under 18 years of age.

- 19.2 The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

### **Pre-employment checks**

- 19.3 The Board of Directors will assess the suitability of prospective employees by:
- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
  - Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
  - Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
  - Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
  - Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed.
  - If the person has lived or worked outside the UK, making any further checks that the club considers appropriate; this includes checking for any sanctions or restrictions that an EEA professional regulating authority has imposed.
  - Checking professional experience.
- 19.4 An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

### **Internal candidates**

- 19.5 References from internal candidates will always be scrutinised before appointment.

### **ITT candidates**

- 19.6 Where applicants for ITT are salaried by the club, the club will ensure that enhanced DBS checks with barred list information are carried out.
- 19.7 Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

#### **Those who have lived or worked outside of the UK**

- 19.8 For those who have lived or worked outside of the UK, additional checks regarding sanctions or restrictions will be conducted, this includes checking for any sanctions or restrictions that an EEA professional regulating authority has imposed.

#### **Barred list check**

- 19.9 An enhanced DBS check may be requested for anyone working in club that is not in regulated activity but does not have a barred list check.
- 19.10 If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.
- 19.11 Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

#### **References**

- 19.12 References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.
- 19.13 References will only be accepted from a senior person and not from a colleague.
- 19.14 References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.
- 19.15 References will be obtained prior to interviews taking place and discussed during interviews.
- 19.16 Open testimonials will not be considered.
- 19.17 Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.
- 19.18 Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

#### **Volunteers**

- 19.19 No volunteer will be left unsupervised with an attendee or allowed to work in regulated activity until the necessary checks have been obtained.

- 19.20 An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.
- 19.21 Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing, and dressing for reasons of age, illness, or disability.
- 19.22 A supervised volunteer who regularly teaches or looks after children is not in regulated activity.
- 19.23 The club will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.
- 19.24 Unless there is cause for concern, the club will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.
- 19.25 A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

#### **Associate members**

- 19.26 Associate members (i.e., individuals that are appointed by the Board of Directors to serve on one or more committees) will not be required to obtain enhanced DBS checks.

#### **Contractors**

- 19.27 The club will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.
- 19.28 Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.
- 19.29 Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the club.

#### **Data retention**

- 19.30 DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.
- 19.31 A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

#### **Referral to the DBS**

- 19.32 The club will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed



from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

**Ongoing suitability**

- 19.33 Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

## **20. Single central record (SCR)**

- 20.1 The club keeps an SCR which records all staff, including supply staff and trainees on salaried routes, who work at the club.
- 20.2 The following information is recorded on the SCR:
- An identity checks
  - A barred list checks
  - An enhanced DBS checks
  - A prohibition from teaching check
  - A check of professional qualifications
  - A check to determine the individual's right to work in the UK
  - Additional checks for those who have lived or worked outside of the UK
- 20.3 For agency and third-party supply staff, the club will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.
- 20.4 If any checks have been conducted for volunteers, this will also be recorded on the SCR.
- 20.5 If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

## **21. Staff suitability**

- 21.1 All centres providing care for attendees under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.
- 21.2 A person may be disqualified if they:
- Have certain orders or other restrictions placed upon them.
  - Have committed certain offences.
- 21.3 All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in the environment.

## **22. Training**

- 22.1 Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated (at least annually) basis or whenever there is a change in legislation.
- 22.2 The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Staff Code of Conduct
- The identity of the DSO and any deputies
- The role of the DSO and deputy DSOs

- 22.3 All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.
- 22.4 Training will cover, at a minimum:
- The issues surrounding sexual violence and sexual harassment.
  - Contextual safeguarding.
  - How to keep previously LAC safe.
  - Child criminal exploitation and the need to refer cases to the National Referral Mechanism.
- 22.5 Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the club.
- 22.6 The SSM and DSO will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up to date with any developments relevant to their role.
- 22.7 The SSM and DSO will also undergo **biennial** Prevent awareness training which will enable them to understand and support the club with regards to the Prevent duty and equip them with the knowledge needed to advise staff.
- 22.8 The SSM and DSO will undergo online safety training to help them recognise the additional risks that attendees with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support attendees with SEND to stay safe online
- 22.9 Online training will also be conducted for all staff members as part of the overall safeguarding approach.

## Child protection and Safeguarding

### 23. FGM

- 23.1 For this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.
- 23.2 FGM is considered a form of abuse in the UK and is illegal.
- 23.3 All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.
- 23.4 Staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Staff failing to report such cases will face disciplinary action.
- NB.** The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.
- 23.5 There are a range of potential indicators that an attendee may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the attendee.
- 23.6 Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the attendee may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.
- 23.7 Indicators that may show a heightened risk of FGM include the following:
- The socio-economic position of the family and their level of integration into UK society
  - Any girl with a mother or sister who has been subjected to FGM
  - Any girl withdrawn from PSHE
- 23.8 Indicators that may show FGM could take place soon include the following:
- When a female family elder is visiting from a country of origin
  - A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
  - A girl may request help from a staff member if she is aware or suspects that she is at immediate risk
  - A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

- 23.9 Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.
- 23.10 Indicators that FGM may have already taken place include the following:
- Difficulty walking, sitting, or standing
  - Spending longer than normal in the bathroom or toilet
  - Spending long periods of time away from a classroom during the day with bladder or menstrual problems
  - Prolonged or repeated absences from club followed by withdrawal or depression
  - Reluctance to undergo normal medical examinations
  - Asking for help, but not being explicit about the problem due to embarrassment or fear
- 23.11 Staff will not examine attendees, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should also consider and discuss any such case with the DSO and involve CSCS as appropriate.
- 23.12 FGM is also included in the definition of ‘honour-based’ violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.
- 23.13 All forms of HBV are forms of abuse and will be treated and escalated as such.
- 23.14 Staff will be alert to the signs of HBV, including concerns that a child is at risk of HBV, or has already suffered from HBV, and will consult with the DSO who will activate local safeguarding procedures if concerns arise.

## 24. Forced marriage

- 24.1 For this policy, a **“forced marriage”** is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter the marriage. Forced marriage is classed as a crime in the UK.
- 24.2 As part of HBV, staff will be alert to the signs of forced marriage including, but not limited to, the following:
- Becoming anxious, depressed, and emotionally withdrawn with low self-esteem
  - Showing signs of mental health disorders and behaviours such as self-harm or anorexia
  - Displaying a sudden decline in their educational performance, aspirations, or motivation
  - Regularly being absent from club
  - Displaying a decline in punctuality
  - An obvious family history of older siblings leaving education early and marrying early
- 24.3 If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSO and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

## 25. Child sexual exploitation (CSE)

A child under the age of 13 can never consent to sexual activity.

The age of consent is 16.

Sexual intercourse without consent is rape.

Rape, assault by penetration and sexual assault are defined in law.

Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

### **Child sexual exploitation: prevention and intervention:**

Evidence summary and framework to support local public health leaders to prevent and intervene early in cases of child sexual exploitation. Published

11 July 2017 Last updated 3 July 2019

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

Child sexual exploitation by organised networks report by the Independent Inquiry into Child Sexual Abuse (IICSA): government response (accessible version)

Published 27 July 2022

[Child sexual exploitation by organised networks report by the Independent Inquiry into Child Sexual Abuse \(IICSA\): government response \(accessible version\) - GOV.UK \(www.gov.uk\)](#)

25.1 For this policy, “**child sexual exploitation**” is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator

25.2 CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

25.3 The club has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

### **Identifying cases**

25.4 Club staff members are aware of and look for the key indicators of CSE; these are as follows:

- Going missing for periods of time or regularly going home late

- Regularly missing lessons
- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying changes in emotional wellbeing
- Misusing drugs or alcohol

#### **Referring cases**

- 25.5 Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA.

#### **Support**

- 25.6 The LA and all other necessary authorities will then handle the matter to conclusion. The club will cooperate as needed.



## **26. Homelessness**

- 26.1 The SSM and DSO will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.
- 26.2 Indicators that a family may be at risk of homelessness include the following:
- Household debt
  - Rent arrears
  - Domestic abuse
  - Anti-social behaviour
  - Any mention of a family moving home because “they have to”
- 26.3 Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.
- 26.4 For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## **27. County lines criminal activity**

- 27.1 For this policy, “**County lines criminal activity**” refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.
- 27.2 Staff will be made aware of attendees with missing episodes who may have been trafficked for the purpose of transporting drugs.
- 27.3 Staff members who suspect an attendee may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSO.
- 27.4 The DSO will consider referral to the National Referral Mechanism on a case-by-case basis.
- 27.5 Indicators that an attendee may be involved in county lines active include the following:
- Persistently going missing or being found out of their usual area
  - Unexplained acquisition of money, clothes, or mobile phones
  - Excessive receipt of texts or phone calls
  - Relationships with controlling or older individuals or groups
  - Leaving home without explanation
  - Evidence of physical injury or assault that cannot be explained
  - Carrying weapons
  - Sudden decline in club results
  - Becoming isolated from peers or social networks
  - Self-harm or significant changes in mental state
  - Parental reports of concern

## **Child Criminal Exploitation**

County lines Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs.

Like other forms of abuse and exploitation, county lines exploitation: -

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.

- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults.
- is typified by some form of power imbalance in favor of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**Gangs:** Many young people are not involved in gangs and want nothing to do with them. However, the behaviour of the small number of young people who are involved has a significant impact on communities, on their families and associates, as well as themselves.

Young people join gangs for reasons which make sense to them, if not to adults. Some reasons why young people may join a gang are:

- Respect and status
- To gain friends
- A sense of belonging
- Excitement
- To find a substitute family
- Power
- Protection
- Money
- Peer pressure

Gangs often leave signs of their presence, and your child might adopt some of these signs, either as a member or as an associate of a gang. Any sudden changes in your child's lifestyle should be discussed.

Signs may include:

- Specific dress style

- Poor behaviour
- Talking differently – new slang or language with an aggressive tone
- Poor school results or skipping school
- Carrying weapons
- Unexplained injuries or sums of money/possessions
- Staying out unusually late
- Graffiti style tags on possessions Interest in music which glorifies weapons/gang culture
- Gangs will often have profiles on social or networking websites like Facebook or Twitter

Girls can be affected by gangs, but their involvement may be harder to spot. They may be asked to hide weapons or drugs or be targeted by male gang members in acts of revenge or gang initiations. All of this tends to go on 'behind closed doors. Girls who are linked to gang members (sisters, girlfriends, friends, cousins, daughters) as well as female gang members themselves, are at risk of emotional, physical, and sexual violence. Many girls who are involved with gangs may believe that what they are being pressured, forced, or choosing to do is acceptable, even normal. They may not realise that what is happening to them is wrong; they may be afraid of what might happen if they tell anyone and/or they may think that no one will believe or protect them.

Some signs that a girl you know might be involved with a gang include:

- Changes in physical appearance (for example wearing more 'adult' clothes, or wearing baggy clothes and no make-up)
- Unexplained money or possessions
- Getting involved in fights
- Committing crimes such as shoplifting
- Regularly staying out late or going missing from home
- Abusing drugs and/or alcohol
- Physical injuries (which may indicate violence from others and/or self-harming)
- Refusing to seek medical help for such injuries and becoming fearful and/or withdrawn and/or prone to unexplained outbursts of anger

Committing crime and ending up with a criminal record will affect the rest of your life. Having a criminal record can prevent a young person getting a job, going to university or college, or even travelling abroad.

### **Cleveland Police County lines advice**

[County lines | Cleveland Police](#)

### **County lines and criminal exploitation toolkit**

[County Lines Toolkit for Professionals | The Children's Society \(childrenssociety.org.uk\)](#)

### **County lines exploitation**

[County lines exploitation - GOV.UK \(www.gov.uk\)](#)

### **Knife Crime**

Knife crime has an enormous impact on young people and the communities in which they live, and not just in London but nationally. It is a societal problem, and it cannot be tackled by schools or single agencies alone. Schools and colleges can only do so much. They must identify, support, help and protect young people on site, and they can do their best to teach them about the dangers of knives and related dangers. They can also teach them to read, write and add up, allowing them to achieve in school and experience success. But young people need everyone in society – the police, LAs, health, youth services, welfare services, housing services, local communities, their parents, social media providers and so on – to work together and to put children first and protect them from county lines, gangs, knives, drugs and from adults who pose a risk to them.

### **Knife Crime Prevention Orders (KCPOs)**

[Knife Crime Prevention Orders \(KCPOs\) - GOV.UK \(www.gov.uk\)](#)

## **28. Serious violence**

28.1 Through training, all staff will be made aware of the indicators which may signal an attendee is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

- Increased absence from club
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries

- Unexplained gifts or new possessions

28.2 Staff will be made aware of some of the most significant risk factors that could increase an attendee's vulnerability to becoming involved in serious violent crime. These risk factors include, but are not limited to, the following:

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

28.3 Staff members who suspect an attendee may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSO.

**29. Attendees with family members in prison**

- 29.1 Attendees with a family member in prison will be offered support as necessary.
- 29.2 They will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

**30. Attendees required to give evidence in court**

- 30.1 Attendees required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate support.
- 30.2 Attendees will also be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

### **31. Contextual safeguarding**

- 31.1 Safeguarding incidents can occur outside of club and can be associated with outside factors. Club staff, particularly the SSM and DSO will always consider the context of incidents – this is known as contextual safeguarding.
- 31.2 Assessment of attendees' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.
- 31.3 The club will provide as much contextual information as possible when making referrals to CSCS.

### **32. A child missing from the Club**

- 32.1 A child going missing from club is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation, or radicalisation.

Staff will monitor attendees that go missing from the club, particularly on repeat occasions, and report them to the DSO following normal safeguarding procedures.

#### **Admissions register**

- 32.2 Attendees are placed on the admissions register at the beginning of the first day that is agreed by the club, or when the club has been notified that the attendee will first be attending.
- 32.3 The club will notify the LA within five days of when an attendee's name is added to the admissions register.
- 32.4 The club will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.
- 32.5 Two emergency contact details will be held for each attendee where possible.
- 32.6 Staff will monitor attendees who do not attend the club on the agreed date and will notify the LA at the earliest opportunity.
- 32.7 If a parent notifies the club that their child will live at a different address, the club will record the following information on the admissions register:
- The full name of the parent with whom the attendee will live
  - The new address
  - The date from when the attendee will live at that address
- 32.8 If a parent notifies the club that their child will be attending a different club, or is already registered at a different club, the following information will be recorded on the admissions register:
- The name of the new club



- The date on which the attendee first attended, or is due to attend, that club

- 32.9 Where an attendee moves to a new club, the club will use a secure internet system to securely transfer attendees' data.
- 32.10 To ensure accurate data is collected to allow effective safeguarding, the club will inform the LA of any attendee who is going to be deleted from the admission register, in accordance with the Education (Attendee Registration) (England) Regulations 2006 (as amended), where they:
- Have been taken out of the club by their parents, and are being educated outside the national education system, e.g., home education.
  - Have ceased to attend the club, and no longer live within a reasonable distance of the premises.
  - Have been certified by the club's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory club age, and their parent has not indicated the intention to the attendee continuing to attend club after ceasing to be of compulsory club age.
  - Have been in custody for a period of more than four months due to a final court order and the club does not reasonably believe they will be returning to the club at the end of that period.
  - Have been permanently excluded.
- 32.11 The club will also remove an attendee from the admissions register where the club and LA has been unable to establish the attendee's whereabouts after making reasonable enquiries into their attendance.
- 32.12 If an attendee is to be removed from the admissions register, the club will provide the LA with the following information:
- The full name of the attendee
  - The full name and address of any parent with whom the attendee lives
  - At least one telephone number of the parent with whom the attendee lives
  - The full name and address of the parent with whom the attendee is going to live, and the date that the attendee will start living there, if applicable
  - The name of the attendee's new club and the attendee's expected start date there, if applicable
  - The grounds for removal from the admissions register under regulation 8 of the Education (Attendee Registration) (England) Regulations 2006 (as amended)
- 32.13 The club will work with the LA to establish methods of making returns for attendees back into the club.

- 32.14 The club will highlight to the LA where they have been unable to obtain necessary information from parents, e.g., where an address is unknown.
- 32.15 The club will also highlight any other necessary contextual information including safeguarding concerns.

### 33. Attendees with SEND

- 33.1 The club recognises that attendees with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of attendees.
- 33.2 Staff will be aware of the following:
- Certain indicators of abuse, such as behaviour, mood, and injury, may relate to the attendee's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
  - Attendees with SEND can be disproportionally impacted by things like bullying, without outwardly showing any signs
  - Communication barriers may exist, as well as difficulties in overcoming these barriers
- 33.3 When reporting concerns or making referrals for attendees with SEND, the above factors will always be taken into consideration.
- 33.4 When managing a safeguarding issue relating to an attendee with SEND, the DSO will liaise with the club's SENCO, as well as the attendee's family where appropriate, to ensure that the attendee's needs are effectively met.

### 34. Alternative provision

- 34.1 The club will remain responsible for an attendee's welfare during their time at an alternative provider.
- 34.2 When placing an attendee with an alternative provider, the club will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

#### Private fostering

- 34.3 Where the club becomes aware of an attendee being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

### 35. Private Fostering

- 35.1 Where the club becomes aware of an attendee being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

### 36 Concerns about an attendee

If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSO.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in [section 41](#) of this policy.

- 36.1 Where the DSO is not available to discuss the concern with, staff members will contact the SSM with the matter.
- 36.2 If a referral is made about a child by anyone other than the DSO, the DSO will be informed as soon as possible.
- 36.3 The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.
- 36.4 Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the attendee.
- 36.5 If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the attendee.
- 36.6 If early help is appropriate, the case will be kept under constant review. If the attendee's situation does not improve, a referral will be considered.
- 36.7 All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSO and kept securely in a **locked cabinet** in the **club office**.
- 36.8 If an attendee is in immediate danger, a referral will be made to CSCS and/or the police immediately.
- 36.9 If an attendee has committed a crime, such as sexual violence, the police will be notified without delay.
- 36.10 Where there are safeguarding concerns, the club will ensure that the attendee's wishes are always taken into account, and that there are systems available for attendees to provide feedback and express their views.
- 36.11 When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the attendee feels like they are being listened to and believed.
- 36.12 An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

## **37 Early help**

37.1 Early help means providing support as soon as a problem emerges, at any point in a child's life.

37.2 Any attendee may benefit from early help, but staff will be alert to the potential need for early help for attendees who:

- Have SEND (whether they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking, or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

37.3 Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

37.4 All staff will be made aware of the local early help process and understand their role in it.

37.5 The DSO will take the lead where early help is appropriate.

### 38 Managing referrals

- 38.1 The reporting and referral process outlined in [Appendix B](#) will be followed accordingly.
- 38.2 All staff members, in particular the DSO, will be aware of the LA's arrangements in place for managing referrals. The DSO will provide staff members with clarity and support where needed.
- 38.3 When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.
- 38.4 The DSO will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, to ensure the wellbeing of the attendees involved.
- 38.5 The DSO will work closely with the police to ensure the club does not jeopardise any criminal proceedings, and to obtain help and support as necessary.
- 38.6 Where an attendee has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. **Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.**
- 38.7 The club will not wait for the start or outcome of an investigation before protecting the victim and other attendees: this applies to criminal investigations as well as those made by CSCS.
- 38.8 Where CSCS decide that a statutory investigation is not appropriate, the club will consider referring the incident again if it is believed that the attendee is at risk of harm.
- 38.9 Where CSCS decide that a statutory investigation is not appropriate and the club agrees with this decision, the club will consider the use of other support mechanisms, such as early help.
- 38.10 At all stages of the reporting and referral process, the attendee will be informed of the decisions made, actions taken and reasons for doing so.
- 38.11 Discussions of concerns with parents will only take place where this would not put the attendee or others at potential risk of harm.
- 38.12 The club will work closely with parents to ensure that the attendee, as well as their family, understands that the arrangements in place, such as in-club interventions, are effectively supported and know where they can access additional support.

### **39 Dealing with allegations of abuse against staff**

- 39.1 Where an allegation is substantiated, and the individual is dismissed or resigns, the club will refer it to the DBS. They will also consider referring the matter to the TRA for consideration for a prohibition order.
- 39.2 If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSCS.
- 39.3 The club will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.

### **40 Allegations of abuse against other attendees (peer-on-peer/child – on - child abuse)**

#### **Sexual harassment**

- 40.1 Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates an attendee's dignity and makes them feel intimidated, degraded, or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.
- 40.2 Sexual harassment includes:
  - Sexual comments.
  - Sexual "jokes" and taunting.
  - Physical behaviour, such as deliberately brushing against another attendee.
  - Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion, and threats – online sexual harassment may be isolated or part of a wider pattern.

• Hartlepool United Football Club has zero tolerance to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

\*Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

\*Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

### Sexual violence

40.3 Sexual violence refers to the three following offences:

- **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- Harmful sexual behaviours

40.4 The term “**harmful sexual behaviour**” is used to describe behaviour that is problematic, abusive, and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

40.5 Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

Guidance – Sharing nudes and semi-nudes: advice for education settings working with children and young people



Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK ([www.gov.uk](http://www.gov.uk))

**A preventative approach**

- 40.6 To prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the club will educate attendees about abuse, its forms, and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.
- 40.7 The club will also ensure that attendees are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:
- Healthy relationships
  - Respectful behaviour
  - Gender roles, stereotyping and equality
  - Body confidence and self-esteem
  - Prejudiced behaviour
  - That sexual violence and sexual harassment is always wrong
  - Addressing cultures of sexual harassment
- 40.8 Attendees will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

**Awareness**

- 40.9 All staff will be aware that attendees of any age and sex can abuse their peers and will never tolerate abuse as “banter” or “part of growing up”.
- 40.10 All staff will be aware that peer-on-peer abuse can be manifested in many ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional, or psychological harm.
- 40.11 All staff will be made aware of the heightened vulnerability of attendees with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the attendee’s SEND and will always explore indicators further.
- 40.12 LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.
- 40.13 The club’s response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

40.14 Attendees will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

**Support available if a child has been harmed, is in immediate danger or at risk of harm**

40.15 If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSCS.

40.16 Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

40.17 If early help, assessments (assessments under the Children Act 1989) are appropriate, club staff may be required to support external agencies. The DSO and deputies will support staff as required.

**Support available if a crime may have been committed**

40.18 Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSO will be aware of the local process for referrals to both CSCS and the police.

40.19 Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

40.20 The club has a close relationship with the local police force and the DSO will liaise closely with the local police presence.

**Support available if reports include online behaviour**

40.21 Online concerns can be especially complicated. The club recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

40.22 If the incident involves sexual images or videos held online, the [Internet Watch Foundation](#) will be consulted to have the material removed.

40.23 Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSO.

**Managing disclosures**

40.24 Victims will always be taken seriously, reassured, supported, and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

40.25 If a friend of a victim makes a report or a member of staff overhears a conversation, staff will act – they will never assume that someone else will deal with it. The basic principles remain the same as

when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSO.

40.26 Where an alleged incident took place away from the club or online but involved attendees from the club, the club's duty to safeguard attendees remains the same.

40.27 All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to remain engaged and not appear distracted.
- Only recording the facts as the child presents them – not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and [UKCCIS sexting advice](#).
- Wherever possible, managing disclosures with two staff members present (preferably with the DSO or a deputy as one of the staff members).
- Informing the DSO or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

40.28 The DSO will be informed of any allegations of abuse against attendees with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the attendee in mind always.

### **Confidentiality**

40.29 The club will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the club not to tell anyone about the disclosure, the club cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

40.30 The DSO will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

40.31 The DSO will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

#### **Anonymity**

40.32 There are legal requirements for anonymity where a case is progressing through the criminal justice system. The club will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

40.33 When deciding on the steps to take, the club will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

#### **Risk assessment**

40.34 The DSO or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

40.35 Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other children at the club, especially any actions that are appropriate to protect them.

40.36 Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the club's **Data Protection Policy**.

#### **Acting following a disclosure**

40.37 The DSO or a deputy will decide the club's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.

- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

40.38 Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

40.39 For reports of rape and assault by penetration, whilst the club establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The club will consider how to keep the victim and alleged perpetrator apart on club premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

40.40 For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

40.41 In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

#### **Managing the report**

40.42 The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the club will speak to the relevant agency to discuss informing the alleged perpetrator.

40.43 There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help
- Referring to CSCS
- Reporting to the police

40.44 Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions, and reasons behind decisions will be recorded either on paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

#### **Managing internally**

40.45 In some cases, e.g., one-off incidents, the club may decide to handle the incident internally through behaviour and bullying policies and by providing support.

#### **Providing Early Help**

40.46 The club may decide that statutory interventions are not required, but that attendees may benefit from Early Help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

#### **Referral to CSCS**

40.47 If a child has been harmed, is at risk of harm or is in immediate danger, the club will make a referral to CSCS. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.

40.48 The club will not wait for the outcome of an investigation before protecting the victim and other children.

40.49 The DSO will work closely with CSCS to ensure that the club's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

40.50 If CSCS decide that a statutory investigation is not appropriate, the club will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

40.51 If the club agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support, and specialist support.

#### **Reporting to the police**

40.52 Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSCS. The DSO and deputies will follow the local process for referral.

40.53 Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the club to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.

40.54 The DSO and **board of trustees** will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

40.55 The DSO will be aware of local arrangements and specialist units that investigate child abuse.

40.56 In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the club will continue to engage with specialist support for the victim as required.

#### **Bail conditions**

40.57 Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

40.58 The club will work with CSCS and the police to support the victim, alleged perpetrator, and other children (especially witnesses) during criminal investigations. The club will seek advice from the police to ensure they meet their safeguarding responsibilities.

40.59 The term ‘released under investigation’ (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

40.60 Where bail is deemed necessary, the club will work with CSCS and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

40.61 Managing delays in the criminal justice system

40.62 The club will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator, and other children. The associated risk assessment will be used to inform any decisions made.

40.63 The DSO will work closely with the police to ensure the club does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

#### **The end of the criminal process**

40.64 Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same club as the victim, the club will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator’s timetable.

40.65 The club will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

40.66 Where an alleged perpetrator is found not guilty or a case is classed as requiring “no further action”, the club will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The club will discuss decisions with the victim and offer support.

40.67 The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

- Ongoing support for the victim

40.68 Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the club uses to describe the victim
- The age and developmental stage of the victim

- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

40.69 Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open, and the victim can choose to appoint a designated trusted adult.

40.70 Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

40.71 The club will provide a physical space for victims to withdraw to.

40.72 Victims may require support for a long period of time and the club will be prepared to offer long-term support in liaison with relevant agencies.

40.73 Everything possible will be done to prevent the victim from bullying and harassment because of any report they have made.

40.74 If the victim is unable to remain in the club, alternative provision or a move to another club will be considered – this will only be considered at the request of the victim and following discussion with their parents.

40.75 If the victim does move to another club, the DSL will inform the club of any ongoing support needs and transfer the child protection file.

- Ongoing support for the alleged perpetrator

40.76 When considering the support required for an alleged perpetrator, the club will consider:

- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

40.77 When deciding, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.



- 40.78 If the alleged perpetrator moves to another club (for any reason), the DSO will inform the destination club of any ongoing support needs and transfer the child protection file.
- 40.79 The club will work with professionals as required to understand why the abuse took place and provide a high level of support to help the attendee understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.
- 40.80 Disciplining the alleged perpetrator
- 40.81 Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the club reaching its own conclusion and imposing an appropriate penalty.
- 40.82 The club will make such decisions on a case-by-case basis, with the DSO taking a leading role. The club will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.
- 40.83 The club will also consider whether circumstances make it unreasonable or irrational for the club to decide about what happened while an investigation is considering the same facts.
- 40.84 Disciplinary action and support can take place at the same time.
- 40.85 The club will be clear whether action taken is disciplinary, supportive or both.
- 40.86 Shared classes
- 40.87 Once the DSO has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on club premises and on club transport – balancing the club's duty to educate against its duty to safeguard. The best interests of the attendee will always come first.
- 40.88 Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on club premises and transport will be prevented.
- 40.89 Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the club would harm the education or welfare of the victim and potentially other attendees.
- 40.90 Where a criminal investigation into sexual assault leads to a conviction or caution, the club will consider suitable sanctions and permanent exclusion. If the perpetrator remains at the club, the club will keep the victim and perpetrator in separate classes and manage potential contact on club premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

40.91 Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected, and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

40.92 In all cases, the club will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

#### **Working with parents and carers**

40.93 In most sexual violence cases, the club will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

40.94 The club will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

40.95 Clubs will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

40.96 Clear policies regarding how the club will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

#### **Safeguarding other children**

40.97 Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

40.98 It is likely that children will "take sides" following a report, and the club will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

40.99 The club will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

40.100 As part of the club's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Clubs will consider any additional support that can be put in place.

### **41 Communication and confidentiality**

41.1 All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with club data protection policies.

- 41.2 Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the club will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.
- 41.3 Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the club will do all it can to protect the anonymity of the attendees involved in the case.
- 41.4 Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.
- 41.5 During disclosure of a concern by an attendee, staff members will not promise the attendee confidentiality and will ensure that they are aware of what information will be shared, with whom and why.
- 41.6 Where it is in the public interest, and protects attendees from harm, information can be lawfully shared without the victim's consent, e.g., if doing so would assist the prevention, detection, or prosecution of a serious crime.
- 41.7 Before doing so, the DSLO will weigh the victim's wishes against their duty to protect the victim and others.
- 41.8 Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.
- 41.9 Depending on the nature of a concern, the DSO will discuss the concern with the parents of the attendees involved.
- 41.10 Discussions with parents will not take place where they could potentially put an attendee at risk of harm.
- 41.11 Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.
- 41.12 Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed.
- 41.13 External agencies will be invited to these discussions where necessary.
- 41.14 Where confidentiality or anonymity has been breached, the club will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.



41.15 Where an attendee is leaving the club, the DSO will consider whether it is appropriate to share any information with the attendee's new provider, in addition to the child protection file, that will allow the new provider to support the attendee and arrange appropriate support for their arrival.

## Vulnerable Adults and Safeguarding

### 42 Recognising the Signs and Suspicions of Abuse in Vulnerable Adults

The following procedure applies to any paid member of staff or volunteer who may be concerned about the safety and protection of a vulnerable adult.

- 42.1 Purpose and aim of procedure: We aim to ensure that adults who may at risk and who attend and/or participate in activities or events organised by HUCSF, and any other vulnerable adults who may come to the attention of HUCSF, receive the protection and support they need if they are at risk of abuse or radicalisation. HUCSF believes that every person is entitled to have their civil and human rights upheld and to live a life free from abuse and neglect. Being able to respond appropriately to signs or suspicions of abuse of vulnerable adults requires an understanding of what vulnerability and abuse is.
- 42.2 Understanding what can contribute to vulnerability in adulthood: An adult may be vulnerable to abuse because they have a mental health problem, a disability, a sensory impairment, is old or frail, has some form of illness or because of their living circumstances - for example, living alone, or in isolation, or in a residential care home, nursing home or other institutional setting. Staff and volunteers of HUCSF need to be aware of circumstances that may leave an adult vulnerable to abuse and be able to recognise the possible signs of abuse. They should be alert to the demeanour and behaviour of vulnerable adults - as well as those around them - and changes that may indicate that something is wrong.
- 42.3 Abuse can be either deliberate or the result of ignorance, or lack of training, knowledge or understanding. Often if a person is being abused in one way, they are also being abused in other ways. Abuse can take many forms including the following:
- 42.4 Sexual abuse: This includes indecent exposure, sexual harassment, inappropriate looking or touching, as well as rape. Sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts, and sexual acts that an individual did not agree to or were pressured into consenting to all count as sexual abuse. Possible indicators of sexual abuse may include:

Unexpected or unexplained change in behaviour	A preoccupation with anything sexual
Torn, stained or bloody underwear	Soreness around the genitals
Sexually transmitted diseases	Indecent Assault
Loss of sleep	Pregnancy

Bruising	Rape
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42.5 Sexual exploitation is a subset of sexual abuse. It involves exploitative situations and relationships where people receive 'something' (e.g., accommodation, alcohol, affection, money) because of them performing, or others performing on them, sexual activities.

42.6 Physical abuse: This can include being assaulted, hit, slapped, pushed, restrained, being denied food or water, or not being helped to go to the bathroom when the person needs to go. It can also include misuse of an individual's medication. Possible indicators of physical abuse may include:

Assault (can be intentional or reckless)	Unexplained weight loss
Multiple bruising	Depression
Fractures	Bed sores
Burns	Fear

42.7 Discriminatory abuse: This includes some forms of harassment, slurs or similar unfair treatment relating to race, gender and gender identity, age, disability, sexual orientation, or religion. Possible indicators of discriminatory abuse may include:

Expressing anger, frustration, fear, or anxiety	The person appears withdrawn and isolated
The support on offer does not take account of the person's individual needs in terms of a protected characteristic	

42.8 Psychological and emotional abuse: This includes someone emotionally abusing an individual or threatening to hurt or abandon them, stopping them from seeing people, and humiliating, blaming, controlling, intimidating, or harassing them. It also includes verbal abuse, cyber bullying and isolation, or an unreasonable and unjustified withdrawal of services or support networks. Possible indicators of psychological and emotional abuse may include:

Deprivation of liberty (false imprisonment)	Unexpected or unexplained change in behaviour
Aggressive shouting causing fear of violence	Loss of sleep

Depression	Confusion
Fear	

42.9 If aggressive shouting (which causes fear) is carried out in a public place it may be an offence against Public Order Act 1986, or harassment under the Protection from Harassment Act 1997.

42.10 Financial and material abuse: This could be someone stealing money or other valuables from an individual, or it might be appointed to look after a person's money on their behalf using the money inappropriately or coercing them into spending it in a way, they are not happy with. Internet scams and doorstep crime are also common forms of financial abuse. Possible indicators of financial and material abuse may include:

Unexplained withdrawals from the bank	Unusual activity in the bank accounts
Unexplained shortage of money	Unpaid bills
Fraud	Theft
Reluctance on the part of the person with responsibility for the funds to provide basic food & clothes	

42.11 Domestic abuse: This is typically an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse by someone who is, or has been, an intimate partner or family member - regardless of gender or sexuality. Domestic abuse also includes psychological, physical, sexual, financial, & emotional abuse. In addition, female genital mutilation (FGM), forced marriage, as well as so called 'honour-based violence' is all classed as domestic abuse. Possible indicators of domestic abuse may include:

Evidence such as bruising, cuts, broken bones	Feeling that the abuse is their fault when it isn't
Verbal abuse and humiliation in front of others	Isolation - not seeing friends and family
Damage to home or property	Fear of outside intervention
Limited access to money	Low self-esteem

42.12 The age range for domestic abuse has been extended down to 16 and if domestic abuse was a concern in an individual then HUCSF's safeguarding children's arrangements would be followed.

42.13 Please note that there is no requirement for automatic referral of adult women with FGM to adult social services or the police. Referral to the police must not be introduced as an automatic response when identifying adult women with FGM, and each case must be individually assessed. Adult women with FGM be supported by offering referral to community groups who can provide support, and clinical intervention or other services as appropriate, for example through an NHS FGM clinic. The wishes of the woman must be always respected. If the woman is pregnant, the welfare of the unborn child or others in her extended family must be considered at this point, as these children are potentially at risk and safeguarding action must be taken accordingly.

42.14 Institutional abuse, neglect &/or poor practice: This may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to persuasive ill treatment or gross misconduct. Possible indicators of institutional abuse, neglect &/or poor practice may include:

People being hungry or dehydrated	Public discussion of personal matters
Inadequate staffing levels	Lack of adequate procedures
Lack of management overview and support	Absence of individual care plans
Poor standards of care	Poor record-keeping and missing documents
Few social, recreational & educational activities	Absence of visitors
Failure to whistle blow on issues when internal procedures to highlight issues are exhausted	
Lack of personal clothing and possessions and communal use of personal items	
Lack of flexibility and choice for people using the service	
Unnecessary exposure during bathing or using the toilet	

42.15 Self-Neglect: This area has now been recognised within The Care Act 2014 as part of the safeguarding framework and includes various behaviours such as a disregarding of personal hygiene, health or surroundings which results in a risk of impacting on the individual's wellbeing. Self-neglect could include such behaviours as hoarding. Possible indicators of self-neglect may include:

Living in squalid or unsanitary conditions	Non-compliance with health or care services
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Lack of essential food, clothing, or shelter	Neglecting household maintenance
Malnutrition and/or dehydration	Very poor personal hygiene
Unkempt appearance	Hoarding
Inability or unwillingness to take medication or treat illness or injury	
Collecting many animals in inappropriate conditions	

42.16 Neglect and acts of omission: Neglect is also a form of abuse. Neglect includes not being provided with enough food or the right kind of food, or not being taken proper care of. Leaving an individual without help to wash or change dirty or wet clothes, not getting them to a doctor when they need one, or not making sure the person has the right medicines all count as neglect. Possible indicators of neglect and acts of omission may include:

Untreated medical problems	Over-sedation
Malnutrition	Bed sores
Deprivation of meals - can be "wilful neglect"	Confusion

42.17 Modern slavery: Modern Slavery is an international crime, it can include victims that have been brought from overseas, and vulnerable people in the UK. Slave Masters and Traffickers will deceive, coerce, and force adults into a life of abuse, callous treatment, and slavery. Possible indicators of modern slavery may include:

Signs of physical or emotional abuse	Always wearing the same clothes
Fear of law enforcers	Lack of personal items/identification documents
Living in dirty, cramped, or overcrowded accommodation and or living and working at the same address	
Isolation from the community, seeming under the control or influence of others	
Avoidance of eye contact, appearing frightened or hesitant to talk to strangers	

Appearing to be malnourished, unkempt or withdrawn

- 42.18 Despite the types of abuse and indicators listed above, staff and volunteers of HUCSF should also remember that any adult with care and support needs - such as older people or people with disabilities - are more likely to be abused or neglected. They may be seen as an easy target and may be less likely to identify abuse themselves or to report it. People with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse.
- 42.19 Evidence of any one of the indicators identified above should not be taken on its own as proof that abuse is occurring. However, it should HUFC staff and volunteers to make further enquiries and to consider other associated factors. The lists of possible indicators and examples of behaviour provided above are not exhaustive and individuals may be subject to several abuse types at the same time.
- 42.20 Understanding where might abuse occur: Abuse can happen anywhere, and it is important to realise that it's not specific to any one type of place or setting:

In someone's own home	At a carer's home
At work or in educational settings	In public places
Within day care, residential care, nursing care or other institutional settings	
In rented accommodation or commercial premises	

- 42.21 Understanding who can be abuse: An abuser can be anyone who has contact with the vulnerable person. This means that abusers can be a partner, spouse, child, relative, friend, informal carer, a healthcare, social care or other worker, a peer or – but less commonly - a stranger. On the following page, further detail is provided about each of the core areas mentioned about who can be abusers:

**Domestic/familial abuse:** This is where the abuse of a vulnerable adult comes from a family member such as a partner, son, daughter and/or sibling.

**Professional abuse:** This is defined as the misuse of power and abuse of trust by professionals, the failure of professionals to act on suspected abuse/crimes, poor care practice or neglect in services, resource shortfalls or service pressures that lead to service failure and culpability because of poor management systems.

**Peer abuse:** This would occur when there is abuse of one vulnerable adult by another vulnerable adult within a care setting. It can occur in group or communal settings, such as day care centres, clubs, residential care homes, nursing homes or other institutional settings.

**Stranger abuse:** A vulnerable adult may be abused by someone who they do not know, such as a stranger, a member of the public or a person who deliberately targets vulnerable people.

#### **43 Procedure for Responding to, Recording and Reporting Actual or Suspected Adult Abuse**

- 43.1 When there are concerns or a disclosure and/or allegations are made in relation to adult abuse, people will often feel anxious about passing on the information to anyone else. It is not unusual for a concerned individual to ask themselves: "What if I'm wrong?" This thought can hold back the person from acting. Therefore, it is important for staff and volunteers of HUCSF to know that they are not responsible for deciding whether abuse has occurred; and neither are staff and volunteers responsible for investigating - as this is the role of the appropriate authorities. However, staff and volunteers do need to pass on any concerns they have through HUCSF's reporting procedures. Most importantly, this responding, recording, and reporting procedure is in place to ensure that HUCSF's staff or volunteers do not attempt to deal with the situation alone.
- 43.2 Methods that adults at risk may use to alert another to signs of abuse or neglect: There are a variety of ways that staff or volunteers of HUCSF could be alerted to the fact that a vulnerable adult is suffering harm. Some of these ways are listed below:
- A vulnerable adult may self-disclose
  - Someone else may raise their concerns or something may happen that causes concern
  - A vulnerable adult may show some signs of physical injury for which there does not appear to be a satisfactory or credible explanation
  - A vulnerable adult's demeanour and/or behaviour may lead suspicions of abuse or neglect
  - The behaviour of a person close to the vulnerable adult may make others feel uncomfortable - which can include another staff member, volunteer, peer, or family member
  - Through general good neighbourliness and social guardianship
  - Being alert to potential abuse plays a major role in ensuring that vulnerable adults are safeguarded, and it is important that all concerns about possible abuse are reported.
- 43.3 Steps to take if a vulnerable adult discloses abuse: In cases where a vulnerable adult discloses abuse to a staff member or volunteer of HUCSF, it is important that the individual knows how to react appropriately and in accordance with the guidelines provided in this handbook. Important things to remember to do include:
- Do stay calm
  - Do listen and hear
  - Do express concern and sympathy about what has happened

- Do reassure the person by telling them that they have done the right thing in speaking up
- Do let the person know that the information will be taken seriously and give them information about what will happen next
- If urgent medical and/or police help is required always call the emergency services
- Do ensure the safety of the person
- Do be aware that medical and forensic evidence might be needed
- Do let the person know that they will be kept involved at every stage
- Do record in writing using HUFCs Vulnerable Adult Abuse Report Form, ensuring that it is dated and signed where indicated and report directly - and without any delay - to HUFC Designated Safeguarding Officer or Deputy Designated Safeguarding Officer who are HUCFC Nominated Managers in matters of adult safeguarding
- Do act without delay
- Important things to remember not to do include:
  - Do not stop someone disclosing
  - Do not promise to keep secrets
  - Do not press the person for more details or make them repeat the story
  - Do not gossip about the disclosure or pass on the information to anyone who does not have a legitimate need to know
  - Do not contact the alleged abuser
  - Do not attempt to investigate yourself
  - Do not leave details of your concerns on a voicemail or by email
  - Do not delay

43.4 Checking out: Staff and volunteers should be aware that there may need to be some initial 'checking out' with the vulnerable adult who has disclosed information to them to ensure the adult at risk's safety.

e.g., if a staff member or volunteer notices a bruise on a vulnerable adult's arm, it would be appropriate to ask, "I see you have a bruise on your arm. How did that happen?" However, HUCSF's staff and volunteers should be careful not to start investigating - as there is a clear distinction between 'checking out' and an investigation. For the avoidance of doubt, HUFC staff and volunteers should not begin to investigate alleged or suspected abuse by asking questions that relate to the detail, or circumstances of the alleged abuse, beyond initial listening, expressing concern and checking out.

43.5 Reporting and recording: Whilst HUFC accepts that there will be emergency situations where it will be appropriate for the staff member or volunteer to contact the police and/or emergency services immediately, in general - whatever the circumstances of the concern, disclosure, allegation or suspicion - it is vital that the staff member or volunteer records the details and reports to their Line

Manager or HUCSF's Nominated Manager without delay. Whenever there are concerns, disclosures, allegations and/or suspicions a record must always be made using the Vulnerable Adult Abuse Report Form - a copy of which is provided in the appendix section of this handbook. In circumstances where a staff member or volunteer reports to a Line Manager, then the Line Manager will be accountable for reporting to HUCSF's Nominated Manager immediately.

- 43.6 Using the pro-forma provide in the appendix section of this handbook, an accurate record should be made of the date and time that the member of staff or volunteer became aware of the concerns, the parties who were involved, and any action taken e.g., if first aid was administered. Any questions that staff or volunteers asked in checking out the concerns must be recorded using exactly the words used. Above all, the record made should be clear and factual as this information will be invaluable to professionals investigating the incident - and may at some time in the future be used as evidence in court. Once this form has been completed HUCSF's Nominated Officer will ensure that the information (whether electronic or paper-based) will keep securely and will only be shared with those who need to know about the concerns, disclosures, allegations, or suspicions of abuse.
- 43.7 Staff and volunteers are asked to make a personal record of the fact that they made a report, with the date and to whom the report was made.
- 43.8 Confidentiality: HUFC will ensure that all information relating to a vulnerable adult - or any concerns about a vulnerable adult - will always be kept confidential and shared on a 'need to know' basis only. HUFCF's staff and volunteers must never discuss information relating to a concern, disclosure or allegation or suspicion - either inside or outside the organisation - other than with those that need to know such as their Line Manager or HUFC's Nominated Manager. HUFCF's Data Protection policies and principles will underpin the maintenance of all records, which includes records of abuse or suspected abuse in relation to vulnerable adults. When HUFC's Nominated Manager is alerted to concerns about a vulnerable adult they will act promptly and ensure:
- That the vulnerable adult is in no immediate danger and that any medical or police assistance required has been sought
  - Due consideration is given to whether the concern is a safeguarding issue or not – which may involve some checking out of information, whilst taking every concern to not stray into the realm of investigation
  - Action to be taken in the event of a non-safeguarding issue being raised: If HUFCs Nominated Manger considers that the matter is not a safeguarding issue and as such no referral to a statutory authority is required, then the following action must be taken:
    - A written record must be made of the concern
    - Details must be kept on file
    - Details of any action taken must be noted
    - Details of the reasons for not referring must be noted

- The situation must continue to be monitored on an ongoing basis

- 43.9 An example of a non-safeguarding occurrence could be an individual who, whilst normally very particular about their appearance and clothes, turns up unkempt with items of clothing on inside out for two days in a row. It would be important to record the details of the concern about the person's appearance and any action taken and the outcome of that action. In this example, the action taken may include speaking to the individual and to their carer (if appropriate) and recording the responses. The carer's response may indicate that they had also noticed the uncharacteristic change in appearance and is equally concerned.
- 43.10 If, because of appropriate checking out, it is then decided that a referral is not required at this stage, then HUFC's Nominated Manager will record the decision not to refer and the reasons for not making a referral. In this example, the situation should be monitored so that a referral can be made if the situation deteriorates. Everything in this example - including the outcome of monitoring and any further concerns coming to light - should be recorded.
- 43.11 Action to be taken in the event of a safeguarding issue being identified: Where it is considered that the concerns represent a safeguarding issue the HUFCs Nominated Manager will discuss the case with the relevant authorities who will help determine whether a crime may have been committed. HUFC's Nominated Manager, as well as any other HUFC's staff or volunteers who were involved in the raising of the concerns are to remain available as required to assist with any resulting investigation.
- 43.12 Information required to make a referral: If a referral is made, then as a minimum the following information will be required:
- The name and address of the vulnerable adult and their current location
  - The nature of the harm
  - The need for medical attention if required
  - The reasons for suspicions of abuse
  - Any action already taken
  - Any other information that may be useful to an investigation e.g., information related to the alleged perpetrator and their location and whether the vulnerable adult is aware of/and has agreed to the referral
- 43.13 All referrals must be made without delay to HUFC's Nominated Manager. However, the priority must always be to ensure the immediate safety and protection of the vulnerable adult. In life threatening situations - such as severe physical abuse - then contact the relevant emergency services immediately

#### **44 Procedure for Dealing with an Allegation made against an Employee or Volunteer**

- 44.1 Allegation procedure to be followed: Where an allegation is made against an HUFC staff member or volunteer it will be HUFCs nominated manager who will be responsible for recording the details of

the incident in full and passing it on to HUCSF's Community Manager. HUFC's Community Manager will then follow the procedure outlined below:

- Through HUFC's Nominated Manager, consultation will take place with the relevant authorities to ensure that any subsequent action taken in relation to the allegations does not prejudice any external investigation.
- Following step 1 being completed, HUFC's Community Manager will inform the staff member or volunteer that an allegation has been made against them and provide the individual with an opportunity to respond to the allegation with the response to the allegation being recorded in full.
- Through HUFC's Nominated Manager, further consultation will take place with the relevant authorities to agree the most appropriate way forward.

44.2 In all cases where allegations have been made against an HUFC staff member or volunteer, protective measures will be taken - which may include either suspending the individual or moving them to alternative duties.

44.3 Where suspension takes place it will always be a neutral act to allow the investigation to proceed and to remove the HUFC staff member or volunteer from the possibility of any further allegation. Suspension will always be for the shortest possible time and will be dealt sensitively. At all times HUFC disciplinary procedure will be followed and HUFC will have due regard to any guidance provided by the relevant authorities.

44.4 Possible outcomes of investigation: As a result of the investigation, the allegation may or may not be substantiated. HUFC considers that there are four possible outcomes to an investigation as outlined below:

**Allegation substantiated** - resulting in an individual being excluded from regulated activity: On the basis that the investigation finds that the allegation is substantiated and that either harm or risk of harm to a vulnerable adult has occurred, then the individual will be removed from regulated activity. In these circumstances HUFC will then be under a statutory duty to refer the incident to the Disclosure and Barring Service (DBS). This referral to DBS will be triggered as soon as the investigation determines either harm or risk of harm has occurred - which could be at this at any stage during the disciplinary process and not necessarily when the process concludes.

If in the event of an allegation having been made against an HUFC staff member or volunteer the individual under investigation subsequently resigns or retires prior to the investigation process being complete, HUFC will always complete the investigation. Should the investigation conclude that harm, or risk of harm to a vulnerable adult has occurred, a DBS referral will still be made.

**Allegation substantiated** - resulting in an individual being reinstated to regulated activity: In a situation where an investigation concludes that the allegation is substantiated, but the circumstances

of the case are such that the individual can be reinstated to their role - subject to appropriate disciplinary sanctions then appropriate training/retraining will be undertaken and support and supervision arrangements will be put in place. If a HUFCF staff member or volunteer is permitted to return to their post in the above circumstances, then a referral to the DBS will not be required.

**Allegation unsubstantiated** - however, ongoing concerns remain: Where the investigation finds that the allegation is unsubstantiated and that the individual has not harmed, or placed at risk of harm, a vulnerable adult - but ongoing concerns about the conduct of HUFC staff member or volunteer remains - then HUFC may conclude that the individual can be reinstated with additional support, supervision, and training/retraining.

**Allegation unsubstantiated** - no ongoing concerns remain: Should the investigation conclude that the allegation is unsubstantiated and therefore no individual has harmed, or placed at risk of harm, a vulnerable adult - then the staff member or volunteer will be reinstated and provided with appropriate support, training, and supervision as necessary.

- 44.5 HUFC fully appreciates that where allegations against any of its staff members or volunteers are made this can be traumatic and unsettling time for the organisation. For this reason, HUFC staff and volunteers should be reassured that any allegations made against them will be dealt with as outlined in this procedure and will always be consistently implemented with due regard to HUFC disciplinary procedures outlined in the employee handbook and the volunteer's handbook. HUFC will always endeavour to handle any investigation into an allegation made against its staff members or volunteers sensitively from initiation to conclusion; whilst managing any anxieties expressed or demonstrated by any vulnerable adult, carer, family member, advocate or any other HUFC staff member or volunteer.
- 44.6 To ensure that all HUFC staff members and volunteers understand the procedure to be followed in the event of concerns or allegations being made HUFC will ensure that induction training thoroughly covers adult safeguarding during induction and through on-going training.
- 44.7 Should any staff member or volunteer of HUFC feel that a safeguarding issue is/has not been taken seriously - having followed the procedure outlined here - then they should invoke the whistle-blowing procedure which is detailed in the Employee Handbook.



## 45 Procedure for Assessing and Managing Risks in the Safeguarding of Vulnerable Adults

45.1 Understanding what is meant by risk assessment: Assessment of risk is the process of examining what could possibly cause harm to vulnerable adults, staff members, volunteers, or others - in the context of the activities and services HUFC provides; in the interactions with and between vulnerable adults; and with the wider community. Risk of harm can be posed by actions and inactions in many different situations such as:

- Intimidation and other threatening behaviours
- Behaviours resulting in injury, neglect, abuse, and exploitation by self or others
- The use of medication
- The misuse of drugs or alcohol
- Aggression and violence
- Suicide or self-harm
- A person's impairment or disability
- Accidents, for example, whilst out in the community or participating in a social event or activity

Individual risk: For the individual, the level of risk (which means the likelihood of an event occurring and the impact it might have) depends on numerous factors which includes the nature of the person concerned, their relationships with others, the choices open to them and the circumstances in which they find themselves.

Organisational risk: For HUFC, the level of risk will depend on the balance achieved between the right of a vulnerable adult to be safeguarded; the duty of care owed to the vulnerable adults served by HUFC; the duty of care owed by HUFC to its staff members and volunteers; the legal duties of statutory bodies and service providers; and the right of vulnerable adults to make informed lifestyle choices and take part in activities.

45.2 No endeavour or activity, or indeed interaction, is entirely risk free and even with good planning, it may be impossible to eliminate risks from any activity, service, or interaction. However, HUFC believes that having in place good risk assessment and management practice is essential to reduce the likelihood and impact of Identified risks. In some situations, living with a risk can be outweighed by the benefit of having a lifestyle that the individual really wants, values, and freely chooses. In such circumstances, risk-taking can be a positive action.

45.3 Consequently, as well as considering the dangers associated with risk, the potential benefits of risk-taking must be considered.

45.4 The purpose of assessing and managing risk: When HUFC assesses and manages risks, the aim is to minimise either the likelihood of risk or its potential impacts. In safeguarding terms, the aim of risk assessment and management is to prevent abuse occurring, to reduce the likelihood of it occurring

and to minimise the impacts of abuse by responding effectively when it does occur. HUFC prioritises the time required time to identify, evaluate and put in place risk-reducing measures.

- 45.6 Principles of working with risk: When HUFC undertakes risk assessments and risk management in relation to vulnerable adults it considers the following principles:
- The assessment and management of risk should promote the independence, real choices, and social inclusion of vulnerable adults
  - Risks change as circumstances change
  - Risks can be minimised, but not eliminated
  - Information relating to vulnerable adults, activities, relationships, and circumstances will sometimes be incomplete and possibly inaccurate
  - Identification of risk then carries a duty to do something about it i.e., risk management
  - Involvement of vulnerable adults, their families, advocates, and practitioners from a range of services and organisations helps to improve the quality of risk assessments and decision making
  - Only decisions that have been based on clear reasoning will be defensible
  - Risk-taking can involve everybody working together to achieve positive outcomes
  - Whilst confidentiality is a right, it is not an absolute right in that it may need to be breached in exceptional
  - in circumstances when people are deemed to be at serious risk of harm, or it is in the public interest
  - HUCSF will ensure that staff members and volunteers understand the standards of practice expected of them to provide them with the confidence to support decisions to take risk
  - Sensitivity will be shown to the experience of people affected by any risks that have been taken and where an event has occurred.
- 45.7 The risk assessment process: In assessing and managing any risk associated with the safeguarding of vulnerable adults, HUFC will follow the risk assessment methodology outlined below. HUFCs risk assessment process involves:
- Identification of the risk or risks
  - Determining the level of risk or risks - by evaluating its potential impact and the likelihood of it happening
- 45.8 Identification of the risk or risks: This involves identifying in advance what risks may be associated with all the activities undertaken by HUFC and the services that are provided.
- 45.9 Risks will always vary dependant on the individual concerned and the nature and extent of their vulnerability. When HUCSF identifies risk, it would always take a balanced approach which will involve looking at what is and what is not an acceptable risk. When identifying risks, HUCSF will specifically focus on safeguarding risks e.g., by identifying the circumstances where abuse or

exploitation are more likely to occur. HUFC acknowledges that risk to vulnerable adults is known to be greater when:

- The vulnerable adult is emotionally or socially isolated
- A pattern of violence exists or has existed in the past
- Drugs or alcohol are being misused
- Relationships are placed under stress

45.10 When care services are provided, HUFC accepts that abuse is more likely to occur if staff members and volunteers are:

- Inadequately trained
- Poorly supervised
- Lacking support or working in isolation.

45.11 In addition, to the known risk factors, a range of other factors may increase the likelihood of abuse:

- Where an illness causes unpredictable behaviour
- Where the person is experiencing communication difficulties
- Where the person concerned demands more than the carer can offer
- Where the family dynamics undergoes change in circumstances e.g., the sudden death of partner, unemployment, divorce
- Where a carer has been forced to change their lifestyle because of becoming a carer
- Where a carer experiences disturbed nights on a regular basis
- Where a carer becomes isolated and is offered no relief from a demanding role
- Where other relationships are unstable or placed under pressure whilst caring
- Where persistent financial problems exist
- Where a partner abuses drugs (especially alcohol), is unemployed or underemployed, is poorly educated or has been in a previous - perhaps turbulent - relationship with the victim
- Where a victim seeks to disclose abuse, get support and/or to leave an abusive relationship

The circumstances and factors listed above are neither exhaustive nor placed in order of priority.

45.12 Determining the level of risk or risks: HUFC will determine the level of risk - high, medium, or low - associated with the risks identified for step 1 above. The purpose of determining the level of risk is to establish which risks warrant most attention. HUFC, as well as its staff members and volunteers, whilst being mindful of all risk, will be able to prioritise and give the greatest and most urgent attention to those risks that have been determined as high. The level of risk will always be a combination of likelihood and resulting impact. For each risk identified, the risk will be rated according to the likelihood of it happening (e.g., from unlikely to likely) and the seriousness of the impact (e.g., from minor to major) if it were to happen.

- 45.13 An example of this approach could be that if HUFC was providing services to adults with epilepsy, it would be fair to assess the level of risk associated with an adult with severe epilepsy having a seizure as high - on the grounds that a seizure is 'likely to occur' and will have a 'major impact' if it does. Therefore, as a risk reducing measure, HUFC would want to ensure that it had enough staff available and trained in responding appropriately to seizures.
- 45.14 As another example, the abuse of a vulnerable adult would in all cases be considered as having a major impact on the adult involved. To reduce the likelihood of the risk of abuse occurring, HUFC would need to put in place a range of safeguarding measures with the aim of reducing the likelihood of abuse.
- 45.15 The matrix below is an illustration of what this approach to risk assessment looks like pictorially and maps 'likelihood' against 'impact' and results in an overall risk level of high, medium, or low.

LIKELIHOOD of the identified risk	Determining the levels of risk		
	Medium	Medium	High
Likely	Low	Medium	High
Possible	Low	Medium	High
Unlikely	Minor	Moderate	Major
	IMPACT of the identified risk		

- 45.16 You will note that the level of risk - assessed as high, medium, or low - is a combination of the likelihood of an identified risk occurring and the impact it would have if it did occur. So, where a risk is:
- Likely to occur and of major impact - the level of risk is high
  - Possible and of moderate impact - the level of risk is medium
  - Unlikely and of minor impact - the level of risk is low
- 45.17 The management of risk: Having carried out the risk assessment using the two steps outlined above, the next step is to look at what can be done to reduce the likelihood of the risk occurring and - in the event of the risk event occurring - what steps could be taken to lessen the impact of those identified risks.

- 45.18 Risks can be managed in several ways, and it is the responsibility of HUFC - the risk owner - to ensure that each identified risk is properly managed. Risk ownership is an ongoing process for the lifetime of the identified risk. The risk owner in HUFC will ultimately be the organisation, but this will become the responsibility of a senior HUFC manager who will be named in HUFC risk log.
- 45.19 HUFC works to establish a culture, which is mindful of and has a zero tolerance of abuse - wherever it occurs and whoever causes it. For HUFC, the primary aim of the organisation's Safeguarding Policy is to manage the risk of abuse to vulnerable adults by establishing an organisational culture in which the rights of vulnerable adults are fully respected and by putting in place the range of policies and procedures that are contained within this handbook. Therefore, HUCSF's Safeguarding Policy has been designed to reduce both the likelihood and impact of abuse by:
- Preventing unsuitable people from joining HUFC through good recruitment and selection practice
  - Making HUFC staff members and volunteers aware of the indicators of vulnerability and risk and the possible signs of abuse - and equipping them to respond quickly to concerns about actual, alleged, or suspected abuse
  - Ensuring that HUFC staff members and volunteers are properly inducted, trained, supported, and supervised in their work with vulnerable adults
  - Ensuring that HUFC staff and volunteers know what constitutes acceptable behaviours and good practice and that they are supported when they challenge poor practice
  - Promoting a culture of inclusion, transparency, and openness throughout HUCSF and its services and activities
  - Making HUFC staff members and volunteers aware of how information about vulnerable adults should be handled
  - Having in place good overall organisational management and practice supported by a range of HUFC policies and procedures
- 45.20 Risk management options: HUFC will manage identified risks in one of five ways – by avoiding the risk; controlling the risk; financing the risk; transferring the risk; or accepting the risk as described below:
- a) Avoiding the risk: If HUFC feels that the level of risk cannot be satisfactorily reduced through other means, then it will make the decision not to engage in a particular activity or provide a particular service
  - b) e.g., due to widespread travel disruption, there is a high risk of an insufficient number of HUFC staff members or volunteers being present to safely supervise an activity for vulnerable adults with physical disabilities who require assistance to participate. As the risk of injury is considered too great in this example, the activity would be cancelled.

- c) Controlling the risk: Controlling risk would involve HUCFC implementing measures to both reduce the likelihood of a harmful event occurring and to minimise the impact of such an occurrence. This would be achieved by identifying the good practice policies that need to be adhered to and the HUFC staff members and volunteers undergoing the necessary training that would be required to reduce risk and harm - e.g. if HUFC were providing an activity for an adult with severe epilepsy, then the organisation would ensure that there were suitably trained HUFC staff members and volunteers present at all times to deal with the situation should the adult at risk have a seizure. While the likelihood of a seizure happening may be high, the impact would be reduced by having in place enough HUFC staff members and volunteers who had been trained to deal with seizures.
- d) Financing the risk: HUFC will provide sufficient resources to meet the liabilities caused by identified risks - e.g., HUFC could risk losing its volunteers if some of them were out of pocket through their volunteering had to give up volunteering. By HUFC allocating a budget to cover volunteer expenses, the high impact of losing volunteers would have been mitigated by reducing the likelihood of it happening
- e) because of financing the risk.

- 45.21 Transferring the risk: At times, when perhaps the only option appears to avoid a risk, HUFC may decide to have a qualified third party carry out a particular activity so that the risk is transferred to that third party - e.g. If HUFC did not have adequately qualified HUFC staff members or volunteers to take a group of physically disabled adults canoeing it could choose to commission qualified instructors to do the activity instead. Risk of financial loss can be mitigated through insurance, indemnity, or exemption from liability. However, HUFC will always be required to take reasonable steps to prevent and manage risk, because if there is a failure to do so, then HUFC may still be liable - even where insurance, indemnity or exemption from liability is in place.
- 45.22 Accepting the risk: This approach would be used when despite the risk, perhaps because no reasonable action can be taken to mitigate it, or the likelihood of the risk occurring and its impact are at an acceptable level, then HUFC would tolerate the risk. HUFC would only ever accept risks which had been assessed to be at a very low level - otherwise some other form of risk-reducing measure would have to be put into place before it could be accepted. The reason for this approach would be to have due regard to the positive outcomes for the vulnerable adult that may accrue from positive risk taking.
- 45.23 Risk log: HUCSF operates a risk log to manage the organisations risk assessment responsibilities. By using a risk log HUFC can demonstrate that it specifically deals with safeguarding risks as part of its risk management. HUCSF keeps under regular review all risks and risk-reducing measures by reviewing them no less than once every 12 months. Situations that would result in HUFC carrying out reviews more frequently would be in circumstances that there is any organisational process of

change - e.g., where HUFC merged with another organisation with different cultures or experience; or where HUFC took on a new activity or service.

- 45.24 Positive risk taking: HUFC does not want a culture which is totally risk averse as these can stifle and constrain opportunity and can lead to inappropriate restrictions being placed upon an individual's rights. Life is never risk free and an appropriate amount of risk is an essential part of fostering independence - e.g., where an activity or set of circumstances is identified as potentially risky to a vulnerable adult or group of vulnerable adults, this risk will always be offset in the risk management process against the benefits which the individual or group might draw from taking part in that activity. HUFC will pursue risk taking in a context of promoting opportunities and safety - not poor practice. Therefore, HUFC will foster a culture of positive risk-taking and seek to involve everyone affected in the assessment of risk taking, such as vulnerable adults and carers, advocates, HUFC staff members and volunteers and - where they are involved.

#### **46 Procedure for Recording Reporting and Reviewing Accidents, Incidents and Near Misses**

- 46.1 HUFC believes that there are lessons to be learned from accidents, incidents or near misses - which may occur despite the most robust risk assessment and risk management process being in place. Because of HUFC having this policy, there is a defined procedure in place for reporting and recording any accidents, incidents and/or near misses that may occur. All HUFC staff members and volunteers will be made aware of this procedure during induction and through regular refresher training after that.
- 46.2 Opportunity to learn: HUFC knows that accidents, incidents and near misses - particularly those which are recurring - can be indicators of organisational risk (including a risk to safeguarding) which needs to be managed. Therefore, HUFC risk assessment documentation and process refer to reported accidents, incidents and near misses. HUFC will ensure that the learnings that come from reporting, recording, and reviewing accidents, incidents and near misses are:
- Identified and disseminated to HUFC F staff members and volunteers
  - Used to inform changes in HUFC practice, policy, and procedures
- 46.3 Where an accident, incident or near miss is in some way connected to a safeguarding matter, it will immediately be drawn to the attention of HUFC Nominated Manager for appropriate action.
- 46.4 Please use the Accident/Incident/Near Miss Report Form which can be found in the appendix section of this handbook.



## **47 Code of Behaviour when Working with Vulnerable Adults**

47.1 HUFC believes that its Code of Behaviour for Working with Adults will minimise the opportunity for vulnerable adults to suffer harm. It will also help to protect HUFC staff members and volunteers by ensuring they are clear about the behaviour that is expected of them and the boundaries within which they should operate. As part of the process of encouraging ownership, HUFC involves its staff members and volunteers, vulnerable adults, as well as carers and advocates, in drafting and reviewing the Code of Behaviour for Working with Adults for the organisation. The following six positive statements underpin HUFCs code of behaviour:

- HUFC will protect the rights and promote the interests of vulnerable adults and carers and advocates
- HUFC will strive to establish and maintain the trust and confidence of vulnerable adults and carers and advocates
- HUFC will promote the independence of vulnerable adults while protecting them as far as possible from danger or harm
- HUFC will respect the rights of vulnerable adults while seeking to ensure that their behaviour does not harm themselves or other people
- HUFC will uphold public trust and confidence in the work that it undertakes with vulnerable adults
- HUFC will be accountable for the quality of the organisations staff members and volunteers work and take responsibility for maintaining and improving their knowledge and skills.

47.2 Behaviours to be avoided: This part of the code of behaviour identifies behaviours that HUFC staff members and volunteers may slip into through lack of experience or training. Although the behaviours listed below are not intentionally harmful, such behaviour can be misconstrued and could ultimately lead to allegations of vulnerable adult abuse being made. Examples of behaviours to be avoided include HUFC staff members and volunteers not:

- Spending excessive amounts of time alone with vulnerable adults away from others
- Taking a vulnerable adult to their own home
- Taking a vulnerable adult alone on car journey, unless this forms part of HUFC core activities

47.3 If any of the above behaviours are unavoidable or necessary, then they should only occur with the full knowledge and consent of a senior manager. At all times an appropriate record must be maintained.

47.4 Behaviours that will always be unacceptable: Unacceptable behaviours are those that must always be avoided in the interests of the safety of vulnerable adults, HUFC staff members and volunteers. Examples of behaviours to be avoided and which HUFC staff members and volunteers must never do include:

- Abuse, neglect, harm, or place at risk of harm vulnerable adults whether by omission or commission
- Engage in rough physical games with vulnerable adults, including horseplay
- Engage in sexually provocative games with vulnerable adults - e.g., spin the bottle and strip poker
- Make sexually suggestive comments to a vulnerable adult
- Form inappropriate relationships with vulnerable adults
- Gossip about personal details of vulnerable adults and their families
- Make and/or accept loans or gifts of money from vulnerable adults
- Where HUCSF staff members and volunteers are required to have physical contact and/or intimate care of a vulnerable adult they must ensure that:
  - Physical contact is person-centred and appropriate to the task required
  - Training has been received to understand and implement a vulnerable adult's care plan, where required
  - When providing intimate care, it is done sensitively and with respect for the individual's dignity and privacy
  - If ever concerned about anything during intimate care, that it is reported without delay to HUFC Nominated Manager

47.5 Use of physical intervention and restraint of vulnerable adults: HUFC's staff members and volunteers should only use forms of restraint for which they have received training, and which follow current best practice. However, regardless of the training received, HUFC's staff members and volunteers should:

- Seek to defuse a situation and thereby avoid the need to use any form of restraint
- Only use restraint where it is necessary to protect the vulnerable adult or others from harm
- Ensure that any restraint used is proportionate to the risk of harm
- Record and report any use of restraint
- Review any situation that led to the need for restraint with HUFC's Nominated Manager with a view to avoiding the need for restraint in the future

47.6 Behaviour guidelines relating to diversity and the additional care and support needs of vulnerable adults: HUFC staff members and volunteers should always:

- Be open to, and aware of, diversity in the beliefs and practices of vulnerable adults and their families
- Ask how a vulnerable adult's care should be delivered having due regard to the cultural needs of others
- Be aware of the difficulties posed by language barriers, as well as other communication difficulties

- Ensure never to discriminate against vulnerable adults and their families who have different cultural backgrounds and beliefs from their own
- Use the procedures outlined in this handbook to report any discrimination against vulnerable adults and their families by other staff members and/or volunteers

47.7 Behaviour guidelines relating to the handling of vulnerable adults' money: HUFC staff members and volunteers should always:

- Maintain records of vulnerable adults' personal allowances, receipts, and expenditure in line with HUFC's related policies
- Ensure never to deny a vulnerable adult access to their money
- Ensure never to gain in any way when using the vulnerable adult's money on their behalf, or guiding the vulnerable adult in the use of their own money
- Ensure never to borrow money from, or lend money to, a vulnerable adult
- Report any suspicions of financial abuse

47.8 Behaviour guidelines relating to the use of technology, including photography: HUFC is conscious that new technologies - such as social networking websites and mobile phones - can be misused by those who are intent on harming or exploiting vulnerable adults. To this end, HUCSF staff members and volunteers should always ensure that they:

- Never photograph and/or video a vulnerable adult, even by mobile phone, without the vulnerable adult's valid consent
- Ensure that any photographs and/or videos taken of a vulnerable adult are appropriate
- Report any inappropriate use of images of a vulnerable adult
- Report any inappropriate or dangerous behaviour on the internet that involves a vulnerable adult

47.9 HUFC believes it is important that vulnerable adults are made aware of the dangers associated with new technology - such as social networking sites and the internet - and know to tell someone if they encounter anything that makes them feel unsafe or threatened.

47.10 Sanctions for HUFC staff members and volunteers who breach this code of behaviour: All HUCSF staff members and volunteers should understand the following:

- If ever unsure of the correct actions to take, or if it is felt that a breach of this code has occurred then the matter should be brought to the immediate attention of a line manager for advice
- Breaches of this code of behaviour is a serious issue that will be investigated
- Breaches of this code of behaviour may result in disciplinary action, a consequence of which could result in staff members being summarily dismissed for gross misconduct and a volunteer's agreement being terminated

- Where a breach of this code of behaviour constitutes harm and/or risk of harm then referral will be made to the police, DBS, and other appropriate regulatory bodies

47.11 Behaviour guidelines which apply to everyone in the organisation and everyone who uses HUFC's services, participates in its activities or visits: Every person that is involved with HUFC - whether a manager, staff member, volunteer, vulnerable adult, visitor, participant or user of its activities and services should relate to each other in a mutually respectful way. The following ground rules should be adhered to by everyone:

- Have respect for each other
- Avoid the use of offensive language
- Do not use alcohol

47.12 Any breaches of this code of behaviour by individuals using HUFC services and facilities could lead to their exclusion. Where the behaviour constitutes abuse - e.g., of a peer, then referral will be made to the police for further investigation and action.

## 48 E-Safety Policy

This policy and the procedures that it underpins apply to all HUFC staff members, including senior managers, paid staff, volunteers and sessional workers, agency staff, students and anyone working on behalf of HUFC. The purpose of HUFC's e-safety policy is to:

1. Protect vulnerable adults who receive HUFC services and make use of information technology (such as mobile phones, games consoles and the Internet) as part of their involvement with the organisation
2. To provide HUFC staff members and volunteers with the overarching principles that guide the organisations approach to e-safety.
3. To ensure that, as an organisation, HUFC operate in line with its values and within the law in terms of how information technology is used

HUFC recognises that:

- The welfare of vulnerable adults who meet its services is paramount and should govern the approach to the use and management of electronic communications technologies
- All vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity have the right to equal protection from all types of harm or abuse
- Working in partnership with vulnerable adults, families, carers, advocates, and other agencies is essential in promoting vulnerable adult's welfare and in helping them to be responsible in their approach to e- safety
- The use of information technology is an essential part of everyone's lives; it is involved in how HUFC gather and store information; as well as how communication takes place. It is also an intrinsic part of the experience of vulnerable adults and is greatly beneficial to all. However, it can present challenges in terms of how it is used responsibly and, if misused either, can be actually or potentially harmful to individuals.

HUFC will seek to promote e-safety by:

- a) Appointing an HUFC e-safety coordinator
- b) Developing a range of procedures that provide clear and specific directions to HUFC staff members and volunteers on the appropriate use of ICT
- c) Supporting and encouraging the vulnerable adults using HUFC services to use the opportunities offered by mobile phone technology and the internet in a way that keeps them safe and shows respect for others
- d) Supporting and encouraging parents, carers, and advocates to do what they can to keep vulnerable adults safe online and when using any other forms of internet connected technology

- e) Incorporating statements about safe and appropriate ICT use into the codes of conduct both for HUFC staff members and volunteers and for vulnerable adults
- f) Developing an e-safety agreement for use with vulnerable adults and their families, carers, and advocates
- g) Use HUFC policies and procedures to deal firmly, fairly, and decisively with any examples of inappropriate ICT use, complaints, or allegations - which may include breaches of filtering, illegal use, cyberbullying, or use of ICT to perpetrate abuse
- h) Informing families, carers, and advocates of incidents of concern as appropriate
- i) Reviewing and updating the security of HUFC information systems regularly
- j) Providing adequate physical security for ICT equipment
- k) Ensuring that usernames, logins, and passwords are used effectively
- l) Using only official email accounts provided via the organisation, and monitoring these as necessary
- m) Ensuring that the personal information of HUFC staff members, volunteers, and service users (including service users' names) are not published on our website
- n) Ensuring that images of vulnerable adults and their families, carers and advocates are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- o) Any social media tools used in the course of our work with vulnerable adults will be risk assessed in advance by the member of staff or volunteer wishing to use them
- p) Providing effective management for HUFC staff members and volunteers on ICT issues, through supervision, support, and training
- q) Examining and risk assessing any emerging new technologies before they are used within the organisation

The name of our e-safety coordinator is Victoria Hutchinson, NCS Co-ordinator and they can be contacted on 01429 862595 & Mobile Telephone Number: 07792 838691 and/or [hucsf@hartlepoolunited.co.uk](mailto:hucsf@hartlepoolunited.co.uk)

An example of HUFC E-Safety Agreement for Use with Vulnerable Adults form can be found in the appendix section of this Vulnerable Adult Safeguarding Policies and Procedures Handbook and further copies can be obtained from HUCSF's Designated Safeguarding Officer.

#### **49 Monitoring and review**

- a. This policy is reviewed annually by the DSO/Manager.
- b. Any changes made to this policy by the Manager/DSO will be communicated to all members of staff.
- c. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

## Appendix A: Staff Disqualification Declaration

Name of club:	
Name of staff member:	Position:
Orders and other restrictions	Yes/No
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions, or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for, or convicted of:	
• Any offence against or involving a child?	
• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	





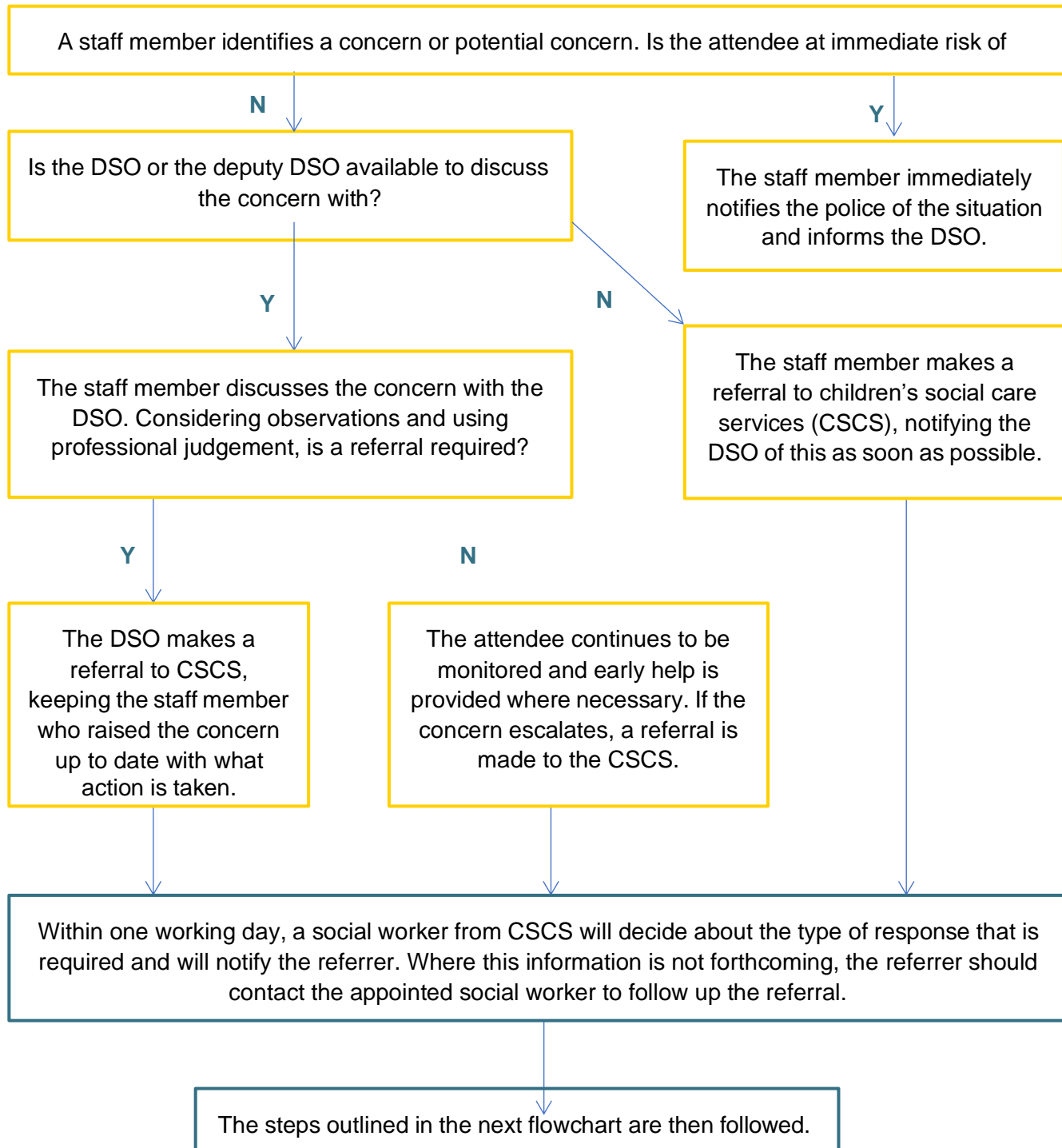
Have you ever been cautioned, reprimanded for, or convicted of a similar offence in another country?		
<b>Provision of information</b>		
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.		
Details of the order restriction, conviction, or caution:		
The date(s) of the above:		
The relevant court(s) or body/bodies:		
<b>You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions, a DBS Certificate may be provided.</b>		
<b>Declaration</b>		
In signing this form, I confirm that the information provided is true to the best of my knowledge and that: <ul style="list-style-type: none"><li>• I understand my responsibilities to safeguard children.</li><li>• I understand that I must notify my manager immediately of anything that affects my suitability to work within the club. This includes any cautions, warnings, convictions, orders, or other determinations made in respect of me that would render me disqualified from working with children.</li></ul>		
Signed:		
Print name:		
Date:		



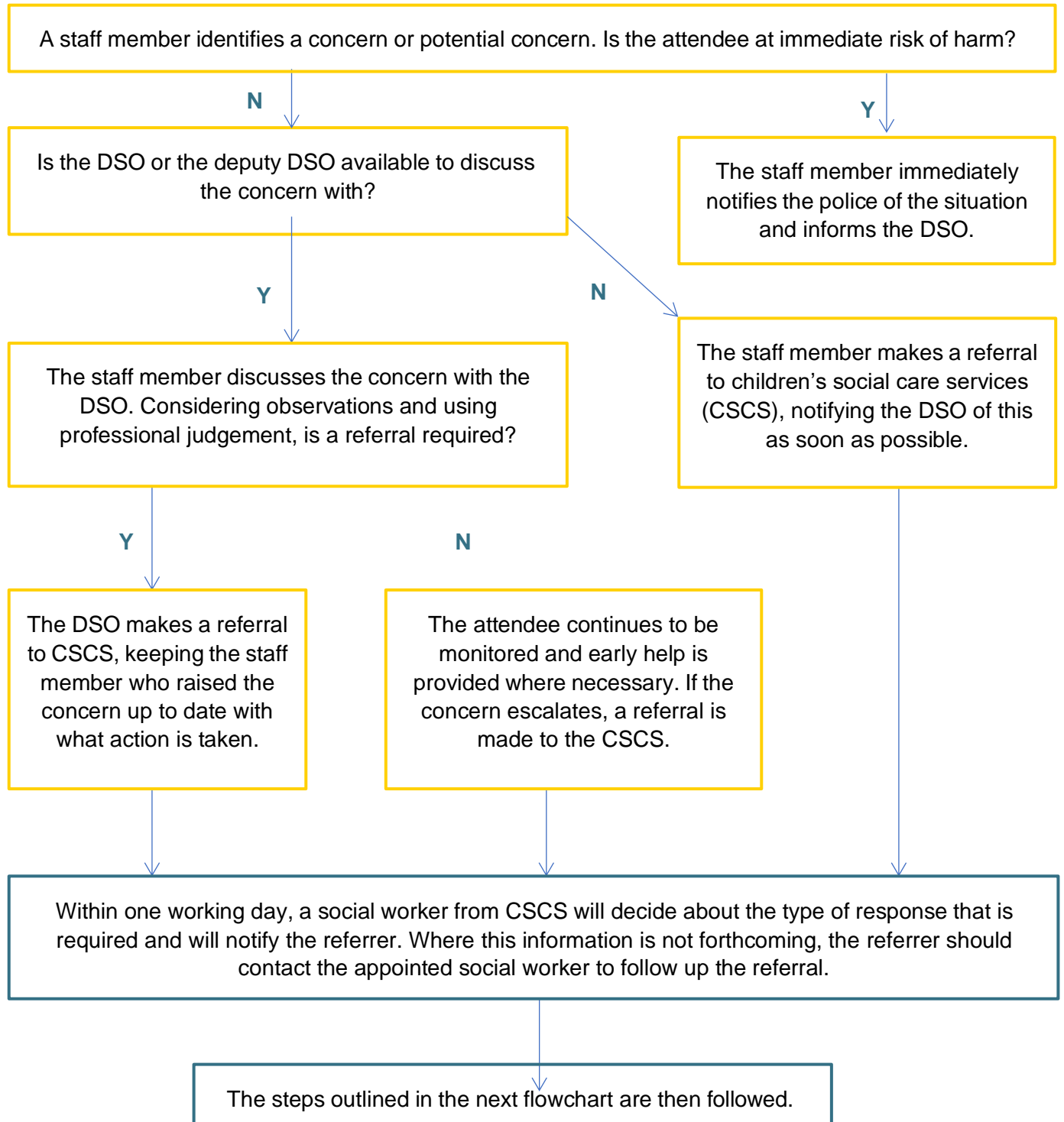
## **Appendix B: Safeguarding Reporting Process**

The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed. The actions taken by the club are outlined in yellow, whereas actions taken by another agency are outlined in blue.

### Before a referral is made



### After a referral is made





## Appendix C: Contacts and Advice

### Expert organisations

- [Barnardo's](#)
- [Lucy Faithfull Foundation](#)
- [NSPCC](#)
- [Rape Crisis](#)
- [University of Bedfordshire: Contextual Safeguarding](#)
- [UK Safer Internet Centre](#)

### Support for victims

- [Anti-Bullying Alliance](#)
- [MoJ Victim Support](#)
- [Rape Crisis](#)
- [The Survivor's Trust](#)
- [Victim Support](#)

### Toolkits

- [Brook](#)
- [NSPCC](#)
- [Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire](#)

### Further information on confidentiality and information sharing

- [Gillick Competency Fraser Guidelines](#)
- [Government Information Sharing Advice](#)
- [Information Commissioner's Office: Education](#)
- [NSPCC: Things to Know and Consider](#)

### Further information on sexting

- [UK Council for Child Internet Safety: Sexting Advice](#)
- [London Grid for Learning – Collection of Advice](#)

### Support for parents

- [Parentzone](#)
- [Parentsafe – London Grid for Learning](#)
- [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)

- [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)

#### **Appendix D: Recording & Reporting Concerns, Disclosures & Allegations or Suspicions of Abuse**

*This form must be used by HUCSF staff members & volunteers to collect the necessary information relating to concerns, disclosures & allegations, or suspicions of abuse of a vulnerable adult.*

<i>Vulnerable Adult Abuse Report Form: Please answer all relevant questions as fully as possible</i>		
<i>Full Name of Vulnerable Adult:</i>		
<i>Gender:</i>	<i>Age:</i>	<i>Date of Birth:</i>
<i>Ethnicity:</i>	<i>Language:</i>	<i>Additional Needs:</i>
<i>Name(s) of Carer(s) if known:</i>		
<i>Home Address if known:</i>		
<b>Section 1: Disclosure by a vulnerable adult</b>		
<i>Date &amp; time of when the disclosure was made:</i>		
<i>The full name of the person that the vulnerable adult made the initial disclosure to:</i>		
<i>Record here what the vulnerable adult said using their words as much as possible:</i>		
<b>Section 2: Indicators</b>		



*Describe here any signs or indicators of abuse with dates and times where relevant:*

*Record here the name/s (and relationship/s to the vulnerable adult) if they have alleged any person as the abuser:*

**Section 3: Concerns expressed by another person about a vulnerable adult**

*Date & time of when the concern was expressed:*

*Record here the concerns that were expressed using the other person's words as much as possible:*

*Where possible, ask the person that expressed the concern, that the details written above are correct.*

**Section 4: Details of any immediate action taken e.g., first aid administered etc.**

**Section 5: Record below whether the vulnerable adult has expressed any reservation about having this matter discussed with an HUCSF Line Manager or HUCSF Nominated Manager**

**Section 6: Identify below whether the vulnerable adult has any support needs**

<i>Section 7: Details of HUCSF staff member or volunteer completing this report form</i>			
<i>Name:</i>		<i>Date &amp; Time of Incident:</i>	
<i>Name:</i>		<i>Position:</i>	
<i>Date &amp; Time of Incident:</i>		<i>Signature:</i>	
<i>Section 8: Date received and actioned by HUCSF's staff member or volunteers Line Manger</i>			
<i>Record action taken by Line Manager:</i>			
<i>Name:</i>		<i>Position:</i>	
<i>Date:</i>		<i>Signature:</i>	
<i>Section 9: Date received and actioned by HUCSF's Nominated Manger</i>			
<i>Record action taken by Nominated Manager:</i>			
<i>Name:</i>		<i>Position:</i>	
<i>Date:</i>		<i>Signature:</i>	

## Appendix E: Procedure for Reporting, Recording and Reviewing Accidents, Incidents & Near Misses

This form must be used to record Accidents, Incidents & Near Misses.

<i>Accident/Incident/Near Miss Report Form: Please circle the one that applies to this record</i>				
<i>Full Name of Person Involved or Injured:</i>				
<i>** If more than one person has been involved, please use a separate form for each person **</i>				
<i>Date:</i>		<i>Time:</i>		
<i>Status of person involved - Please circle the one of the following:</i>				
<i>Vulnerable Adult</i>	<i>Employee</i>	<i>Volunteer</i>	<i>Visitor</i>	<i>Other</i>

<i>If "other" has been circled, please specify the status of the person:</i>		
<b>Details of accident/incident/near miss:</b>		
<i>Please provide details of what happened prior to the event, the details of the event being recorded and what was done immediately and by whom:</i>		
<i>If a drawing is helpful to this record, please use the back of this form to make the drawing.</i> <i>Please provide details of any injuries, as well as any first aid or medical treatment that was given:</i>		
<b>Details of person completing this report form:</b>		
<i>Name:</i>	<i>Position:</i>	
<i>Date:</i>	<i>Signature:</i>	
<b>This section is to be completed by HUCSF management only:</b>		
<i>Record what action is to be taken to prevent the accident, incident or near miss from happening again:</i>		
<i>Is a risk assessment (or support plan) review required as a result record?</i>	<i>Yes</i>	<i>No</i>
<b>Action to be conducted by:</b>		
<i>Name:</i>	<i>By date:</i>	
<b>Reviewed by HUCSF line manager:</b>		
<i>Name:</i>	<i>By date:</i>	
<b>RIDDOR report confirmed by HUCSF Line Manager where appropriate:</b>		
<i>Name:</i>	<i>Position:</i>	

## **Appendix F: Essential HUCSF User Information**

The following information will be collected when vulnerable adults access HUCSF's services.

*This information is confidential and is subject to HUCSF's procedures relating to the Management of Records, Confidentiality & Sharing of Information Policy*

*HUCSF activity or service that is being accessed:*

***Personal Details:***

*Name of Adult:*

*Address:*

*Telephone No:*

*Mobile No:*

*Is any medication being taken?*

*Yes*

*No*

*If "yes" please list all medication:*

***Contacts for Emergencies of People in a Position to Collect this Person if Necessary:***

***Contact one***

***Contact two***

*Name:*

*Name:*

*Address:*

*Address:*

*Relationship:*

*Relationship:*

*Home Telephone No:*

*Home Telephone No:*

*Work Telephone No:*

*Work Telephone No:*

*Mobile No:*

*Mobile No:*

***Doctors Contact Details:***

<i>Name:</i>		
<i>Address:</i>		
<i>Telephone No:</i>		
<i>Medical Details:</i>		
<i>Are there any medical conditions? (If "yes" please detail below)</i>	<i>Yes</i>	<i>No</i>
<i>Are there any allergies, including food &amp; medication? (If "yes" please detail below)</i>	<i>Yes</i>	<i>No</i>
<i>Is there any hearing loss? (If "yes" please detail below)</i>	<i>Yes</i>	<i>No</i>
<i>Is there any sight impairment? (If "yes" please detail below)</i>	<i>Yes</i>	<i>No</i>
<i>Record any issues relating to the following:</i>		
<i>Physical health? (If "yes" please detail below)</i>	<i>Yes</i>	<i>No</i>
<i>Mental health &amp; emotional well-being? (If "yes" please detail below)</i>	<i>Yes</i>	<i>No</i>

Awareness & decision-making skills? (If "yes" please detail below)	Yes	No
Personal care & daily tasks? (If "yes" please detail below)	Yes	No
Administration of medicines? (If "yes" please detail below)	Yes	No
Walking & movement? (If "yes" please detail below)	Yes	No
Communication & sensory functioning? (If "yes" please detail below)	Yes	No
Consent:		
I agree that the information provided may be shared with other staff/volunteers/professionals who can contribute to providing me a service, activity, or care.	Yes	
I understand that I may withdraw my consent to share information or have further assessment at any time, but that this may affect ability to provide full services for me.	Yes	
If there is any information on this form that you should not be shared, please specify:		
The following information should not be shared:		
If there is anyone that information should not be shared with, please specify:		



*The following people/organisations should not have access to my information:*

*To be completed by the person this information related to (if possible):*

<i>Name:</i>	<i>Date:</i>
--------------	--------------

*Signature:*

*To be completed if this form is signed by someone other than the vulnerable adult:*

*Please detail the relationship to the vulnerable adult:*

*Please detail the grounds on which authority arises to sign on the vulnerable adult's behalf:*

*The answer given here cannot be construed as enabling consent on behalf of the adult this form relates to.*

*Reviewed by HUCSF line manager:*

<i>Name:</i>	<i>By date:</i>
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## Appendix G: E-Safety Agreement for Use with Vulnerable Adults

*This e-safety agreement must be signed before a vulnerable adult can make use of HUCSF's ICT*

HUCSF understands the importance of emerging technologies for vulnerable adults' education and personal development and seeks to support vulnerable adults in making use of these in the work that we undertake with them. However, HUCSF also recognises that safeguards need to be in place to ensure that vulnerable adults are always kept safe.

**\*\*\* Information for Vulnerable Adults, Family Members, Carers & Advocates \*\*\***

This agreement is part of HUCSF's Code of Behavior. It also fits with HUCSF's overarching e-safety policy and the expectations that the organisation has for its staff members and volunteers in terms of their use of communications technologies - such as the internet and mobile phones. If further information is required about this agreement or HUCSF's Code of Behavior, please speak to a HUCSF line manager; group leader or to the E-Safety Co-ordinator *Victoria Hutchinson*.

**Instruction to Vulnerable Adults:**

Please read the agreement below - with a family member, carer or advocate if required - and if there is anything that you do not understand, please discuss further with HUCSF's Group Leader.

**Guidance for Family Members, Carers and/or Advocates of a Vulnerable Adult:**

If asked to do so, please read and discuss this agreement with the vulnerable adult and ask them to sign it. If the vulnerable adult is unable to sign and someone signs on their behalf, please complete the concluding section below where indicated. Once this form has been completed, please return it to HUCSF's Group Leader.

#### *Vulnerable Adults Agreement:*

1. I will be responsible for my behavior when using the Internet. This includes resources I access and the language I use.
2. I will not deliberately browse, download, or upload material that could be considered offensive, illegal or is linked with terrorism or extremism. If I accidentally come across any such material, I will report it immediately to HUCSF's Group Leader.
3. I will not send anyone material that could be considered threatening, bullying, offensive or illegal.
4. I will not give out any personal information such as name, phone number or address.
5. I will not reveal my passwords to anyone.

#### *Declarations:*

*I understand that all my use of the internet and other related technologies will be monitored and logged and can be made available to the group leader.*

Y  
e  
s

*I understand that these rules are designed to keep me safe and that if they are not followed my access to HUCSF's ICT will be removed.*

Y  
e  
s

#### *To be completed by the vulnerable adult (if possible):*

*I have reviewed this policy (or had it explained to me) and agree to support the safe use of ICT at HUCSF.*

*Name:*

*Date:*

*Signature:*

#### *To be completed below if this form is signed by someone other than the vulnerable adult:*

*Please detail the relationship to the vulnerable adult:*

*Please detail the ground on which authority arises to sign on the vulnerable adult's behalf:*



## Appendix H: Contact Details for HUFC's Vulnerable Adults Safeguarding Responsibilities

The following information is provided to help direct HUFC staff members, volunteers, adults, parents, and carers to the right person for help, guidance and/or advice. This page details in one place, all the relevant contacts to assist with contacting the right person without delay.

Role	Name & Job Title	Contact details
Safeguarding Senior Manager (SSM)	Rose Stoker	07702593436 01429 272584 <a href="mailto:rose.stoker@hartlepoolunited.co.uk">rose.stoker@hartlepoolunited.co.uk</a>
Designated Safeguarding Officer (DSO) – (Academy)	Daniel Taylor	07305270147 01429 272584_ <a href="mailto:safeguarding@hartlepoolunited.co.uk">safeguarding@hartlepoolunited.co.uk</a> <a href="mailto:dan.taylor@hartlepoolunited.co.uk">dan.taylor@hartlepoolunited.co.uk</a>
Deputy Designated Safeguarding Officer (DDSO)	Christopher Burton, Lead Coach	07807772004 01429 272584 <a href="mailto:hucsf@hartlepoolunited.co.uk">hucsf@hartlepoolunited.co.uk</a>
E-Safety Co-ordinator	Victoria Hutchinson, NCS Co-ordinator	07792838691 01429 272584 <a href="mailto:hucsf@hartlepoolunited.co.uk">hucsf@hartlepoolunited.co.uk</a>
Health and Safety Officer	Keith Nobbs, Community Manager	07788724588 01429 272584 <a href="mailto:hucsf@hartlepoolunited.co.uk">hucsf@hartlepoolunited.co.uk</a>
Integrated Single Point of Access (ISPA)	Hartlepool Borough Council	01429 523390
Local Police	Hartlepool Main Police Station	Non-emergency: 101 Emergency: 999

In addition to the above designated safeguarding personnel and statutory bodies, HUCSF's Designated Safeguarding Officer will also liaise with the following Safeguarding Leads for the Football Club and the FA and/or the EFL Trust whenever there is a safeguarding concern.

FA Local Welfare Officer	Neil Churcher	0191 387 2929 <a href="mailto:Neil.Churcher@durhamfa.com">Neil.Churcher@durhamfa.com</a>
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EFL Trust's Designated Safeguarding Officer	Tara Lawson	07964905652 08001 691863 <a href="mailto:Tlawson@efltrust.com">Tlawson@efltrust.com</a> <a href="mailto:jwyatt@efltrust.com">jwyatt@efltrust.com</a>
	Joe Wyatt Interim Safeguarding & Incident Manager	07866884186

HUFC will review these Accountabilities for HUFC Vulnerable Adults Safeguarding Responsibilities every time a change in personnel and/or good practice dictates, but always annually.

#### Appendix I: Contact Details for Child Protection and Safeguarding Responsibilities

Throughout the Child Protection and Safeguarding policy and procedures, various job titles are mentioned in directing HUFC staff members, volunteers, children, young people, parents, and carers to the right person for help, guidance and/or advice. This page details in one place all the relevant contacts to assist with contacting the right person without delay.

Role	Name & Job Title	Contact details
Safeguarding Senior Manager (SSM)	Rose Stoker	07702593436 01429 272584 <a href="mailto:rose.stoker@hartlepoolunited.co.uk">rose.stoker@hartlepoolunited.co.uk</a>
Designated Safeguarding Officer (DSO) - Academy	Daniel Taylor	07305270147 01429 272584 <a href="mailto:safeguarding@hartlepoolunited.co.uk">safeguarding@hartlepoolunited.co.uk</a> <a href="mailto:dan.taylor@hartlepoolunited.co.uk">dan.taylor@hartlepoolunited.co.uk</a>
Deputy Designated Safeguarding Officer (DDSO)	Christopher Burton, Lead Coach	07807772004 01429 272584 <a href="mailto:hucsf@hartlepoolunited.co.uk">hucsf@hartlepoolunited.co.uk</a>
E-Safety Co-ordinator	Victoria Hutchinson, NCS Co-ordinator	07792838691 01429 272584 <a href="mailto:hucsf@hartlepoolunited.co.uk">hucsf@hartlepoolunited.co.uk</a>
Health and Safety Officer	Keith Nobbs, Community Manager	07788724588 01429 272584 <a href="mailto:hucsf@hartlepoolunited.co.uk">hucsf@hartlepoolunited.co.uk</a>

Hartlepool and Stockton-on-Tees Safeguarding and Children Partnership (HSSC)	Hartlepool Borough Council	01429 523825
HSSCP Designated Officer	Phil Curtis	01429 401844
NSPCC	Helpline	0808 800 5000 or <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Childline	Helpline	0800 1111
Local Police	Hartlepool Main Police Station	Non-emergency: 101 Emergency: 999

In addition to the above designated safeguarding personnel and statutory bodies, HUCSF's Designated Safeguarding Officer will also liaise with the following Safeguarding Leads for the Football Club and the FA and/or the EFL Trust whenever there is a safeguarding concern.

FA Local Welfare Officer	Neil Churcher	0191 387 2929 <a href="mailto:Neil.Churcher@durhamfa.com">Neil.Churcher@durhamfa.com</a>
EFL Trust's Designated Safeguarding Officer	Tara Lawson  Joe Wyatt Interim Safeguarding & Incident Manager	07964905652 08001 691863 <a href="mailto:Tlawson@efltrust.com">Tlawson@efltrust.com</a>  <a href="mailto:jwyatt@efltrust.com">jwyatt@efltrust.com</a> 07866884186

HUFC will review these Accountabilities for HUFC Vulnerable Adults Safeguarding Responsibilities every time a change in personnel and/or good practice dictates, but always annually.