

Plymouth Argyle Football Club



Safeguarding Adults at Risk Policy & Procedures

Plymouth Argyle Football Club Safeguarding Adults at Risk Policy & Procedures

Contents	Page
Safeguarding Policy	5.
Policy Aims	5.
Scope of Policy	6.
Key contact details	7.
Information and Procedure	8.
Useful Definitions	8.
Definition of the term Adult at Risk	8.
Roles and Responsibilities	9.
Recruitment and Disclosure.	10.
Induction and Training	10.
Working with external partners	10.
Safeguarding and the Care Act 2014	11.
Relationship to Safeguarding Children Principles	11.
What is Abuse?	12.
Abusers/perpetrators	12.
Where may abuse occur?	12.
Types of Abuse	14.
Physical Abuse	14.
Sexual Abuse	14.
Psychological/Emotional Abuse	15.
Financial/Material Abuse	15.
Neglect and Acts of Omission	15.
Self-Neglect	16.
Discriminatory Abuse	16.
Domestic Abuse	17.
Modern Slavery	17.
Institutional or Organisational Abuse	18.
Radicalisation	18

Factors associated with Abuse.	Page 18.
What to look out for	19.
Signs and Symptoms of Abuse	19.
Physical Abuse Indicators	19.
Sexual Abuse Indicators	19.
Psychological/Emotional Abuse Indicators	20.
Financial Abuse Indicators	20.
Neglect and Self Neglect Indicators	20.
Discriminatory Abuse Indicators	21.
Domestic Abuse Indicators	21.
Modern Slavery Indicators	22.
Institutional or Organisational Abuse Indicators	23.
Good Practice and Code of Conduct	23.
Poor Practice	26.
Creating the atmosphere for someone to tell you what is wrong	27.
Key points to remember about disclosure	28.
Disclosures and Concerns of Abuse.	29.
Responding to Safeguarding Concerns	29.
Managing the Disclosure – Do’s and Don’ts	30.
What to record	31.
Confidentiality	32.
If there is a risk of Immediate Harm	33.
Duty to report and consent issues	33.
If it is necessary to share information outside the organisation.	34.
When can information be shared without consent?	35.
Making a decision not to refer.	36.
Where there is no emergency.	36.
Role of staff supporting the Adult at Risk	37.
Role of the Safeguarding Manager and Safeguarding Officer	38.
Incidents or Allegations Involving PAFC staff	39.

Informing the League/FA	Page	39.
Internal Enquiries and Suspension.		39.
Capacity		42.
The Statutory Principles		42.
The two-stage test for assessing capacity		43.
Unwise Decisions		43.
Other Considerations		44.
The Data Protection Act 1998 & GDPR		44.
Vital Interest		44.
Other Associated Policies		46.
Safer Recruitment and Selection (including Recruitment of ex-offenders) Dignity at Work		
Equal Opportunities, Diversity and Inclusion.		
Whistleblowing (Public Interest Disclosure) Policy		
Health and Safety Policy.		
Safeguarding Within Partnerships Policy		
Safeguarding Social Media Policy.		
Excursions and Events Policy.		
Photography and Digital Images		47.
Disciplinary Procedure.		
Grievance Procedure		
Modern Slavery and Human Trafficking Policy. Guidance for the Searching & Ejecting of Adults at Risk.		
Preventing Radicalisation & Extremism		47.
Flowchart – Allegation or Incident of Abuse of an Adult at Risk		49.
Flowchart – Allegation of Abuse/Poor Practice by a member of PAFC staff against an Adult at Risk		50.
Useful Contacts		51.
Related Guidance		53.
Policy Review		53.

Safeguarding Policy

Plymouth Argyle Football Club is committed to safeguarding and protecting Adults at Risk and fully accepts a duty of care for the safety and welfare of all Adults at Risk who engage with the club.

The welfare of Adults at Risk is of paramount importance and the club acknowledges that all Adults at Risk have a right to be protected from abuse and discrimination regardless of their gender, race, disability, sexual orientation, religion, belief or age.

Through the application of Safeguarding and Safer Recruitment policies, procedures and best practice, the club promotes the safety, welfare and well-being of all Adults at Risk enabling them to participate in any club activity in an enjoyable, safe and inclusive environment. The participation of Adults at Risk may be as players, coaches, employees, volunteers, officials, administrators or spectators.

Plymouth Argyle Football Club endeavours to provide opportunities for adults with disabilities and mental health problems whilst also undertaking to create a safe and welcoming culture for the participants.

The club has a commitment to manage, monitor and investigate allegations of discrimination, harassment, abuse and bullying and to work in partnership with other statutory agencies to this end.

Policy aims

The aim of Plymouth Argyle Football Club's Safeguarding Adults at Risk Policy is to promote good practice and to enable staff, to ensure that we:

- Safeguard the welfare of Adults at Risk by protecting them from physical, sexual or emotional abuse and from neglect, bullying or financial harm, exploitation or any form of abuse whilst in the care of Plymouth Argyle Football Club.
- Provide relevant Safeguarding Guidance and Training, for staff, players and volunteers, raising awareness so that they can prevent, identify and respond to abuse or concerns.
- Enable staff/volunteers to make informed and confident responses to specific Safeguarding issues, including when to report to the appropriate authorities any

concerns about suspected abuse or harm to Adults at Risk, whether this occurs within the game or elsewhere and whether this be a criminal offence or other concern.

Scope

This policy covers all activities within the club, Stadium Match Days and events, Academy and any external club managed activities.

.

PLYMOUTH ARGYLE FOOTBALL CLUB

SAFEGUARDING TEAM

Chairman – Simon Hallett

Safeguarding Lead

Andrew Parkinson 01752 562561 Ext 153

Safeguarding Manager

Andrew Parkinson

01752 562561 Ext 153

Safeguarding Officers – Club

Pete Bellamy 01752 562561 Ext. 159

Safeguarding Officers - Academy

Information and Procedure

Useful definitions

Staff or Employees

Defined as any member of the workforce either paid or unpaid. **DSO**

Designated Safeguarding Officer

DBS

Disclosure & Barring Service

CRC

Criminal Records Checks

Definition of the term Adult at Risk

The Care Act 2014 s.42 identifies an “[Adult at Risk](#)” as any person aged 18 years and over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs),
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The adult’s needs arise from or are related to a physical, mental, sensory, learning or cognitive disability or illness, substance misuse or brain injury.

Roles and Responsibilities

The club has a comprehensive safeguarding structure which ensures the safety and welfare of all Adults at Risk who interact with the club. The Safeguarding Team consists of; the Chief Executive Officer, the Safeguarding Lead, the Safeguarding Manager and Designated Safeguarding Officers.

Chairman is responsible for all aspects of the club and to ensure safeguarding is a key priority at Board Level.

Safeguarding Lead is responsible for providing club-wide strategic leadership that assists the club to deliver the safeguarding strategy, vision, values, priorities, policies to promote the welfare of vulnerable groups, communicating at Director and Heads of Department level on a weekly basis, or when safeguarding issues arise.

Safeguarding Manager reports directly to the Safeguarding Lead and is responsible for the strategic and operational direction and embedding safeguarding across the club. The Safeguarding Manager is the lead point of contact should safeguarding concerns arise within the club, on Match Days or events within Home Park, Academy or any other PAFC activity and is responsible for maintaining accurate records of safeguarding incidents or concerns. The club Safeguarding Manager is also the Lead Disclosure Officer in respect of Safer Recruitment.

Designated Safeguarding Officers (DSO) are responsible for embedding safeguarding within their own departments as well as being a point of contact should a safeguarding concern arise. DSOs have a duty to accurately record safeguarding concerns or allegations and to report them to the club Safeguarding Manager.

Employees, agency staff, consultants and volunteers are responsible for familiarising themselves with the club's safeguarding policies and procedures, ensuring the safety and welfare of all Adults at Risk as well as promoting best practice and creating a safe and inclusive environment, to prevent harm occurring through awareness of what constitutes abuse and neglect.

Recruitment and Disclosure

Plymouth Argyle Football Club operates a Safer Recruitment and Selection Policy, the processes of which ensure that offers of work for those roles which have contact with Adults at Risk are subject to stringent checks. All offers of work are subject to a satisfactory outcome to the rigorous screening process. All staff and volunteers in a position of trust are required to undergo regular DBS disclosure clearances, normally every three years or earlier if required. Further information can be found in the club's Recruitment Policy and Safer Recruitment and Selection Policies available on the club's website.

When the club uses suppliers or agencies to undertake its work, they are subject to rigorous vetting and safeguarding checks and required to adhere to the club's policy and procedures as set out in their contracts or service level agreements where relevant. For further advice see the Safeguarding Within Partnerships Policy, available on the club's website.

Induction and Training

During the induction process, staff who work with or come into contact with Adults at Risk are required to complete the club's Safeguarding induction training.

Typically, the training staff will undertake will include, but is not limited to: The F.A. Safeguarding Children Workshop and the Premier League Safer Working Practice guidance. Staff also receive training in respect of this Policy and Procedures and are required to sign an acknowledgement confirming they have read and agree to abide by them. Safeguarding training to staff is provided regularly, proportionate to their role and as the training need arises or is identified by an individual, the club or League.

Working with external partners

The club will ensure external partners or organisations we engage with promote the safety and welfare of adults at risk via contracts and/or service level agreements.

External partners and organisations are required to demonstrate competencies in safeguarding and the club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements they will be expected to comply with the club's Safeguarding standards

Care Act 2014 -Safeguarding the Principles

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Relationship to Safeguarding Children Principles

The key differences when dealing with Safeguarding Concerns in respect of Adults at Risk when compared to the Safeguarding Principles in respect of Children and Young people is as follows:

- The definition of 'Adult at Risk' is always open to interpretation and individuals may be vulnerable at sometimes and not others.
- Adults at Risk may consent to sexual activities and the issue of consent may affect the reporting and management of allegations.
- Adults have a right to self-determination. They may not wish to have others intervene to safeguard them and, in most circumstances, a referral to an outside agency, including statutory agencies, may only be made with the Adult at Risk's consent.
- A child can be easily identified by their age (under 18 years) whereas it is not always obvious who may be an Adult at Risk or to be certain if that person has Mental Capacity, which allows them to make informed decisions about their care, finances, treatment, welfare or best interests.

What is Abuse?

Abusive behaviour towards Adults at Risk can range from poor practice to Serious Criminal Offences and can be any form of physical, financial, emotional or sexual mistreatment, lack of care or exploitation that leads to injury, harm or financial loss.

The **Care Act 2014** recognises the below forms of abuse:

Physical abuse

Domestic violence or abuse

Sexual abuse

Psychological or emotional abuse

Financial or material abuse

Modern slavery

Discriminatory abuse

Organisational or institutional abuse

Neglect or acts of omission

Self-neglect

Abusers/perpetrators

People who behave abusively come from all backgrounds and walks of life. Abusers could be anyone including the Adult at Risk's relative, friend, partner or neighbour, be the staff members, volunteers or others in a position of trust who are involved in the same activities or workplace as the person experiencing abuse, an online contact or a complete stranger.

The abuse may be committed by one individual against another or be institutional, in that the whole organisation colludes in abusive practices either through ignorance or choice.

Where may abuse occur?

Abuse of an Adult at Risk may occur during a Plymouth Argyle Football activity or could be reported to a Plymouth Argyle Football Club representative (or indicative signs noticed) when abuse has occurred outside a club activity.

There can be many scenarios, including:

- Adults at Risk playing, officiating, coaching, spectating or administering within a variety of activities at Plymouth Argyle Football Club may be at risk of abuse from other adults who may or may not be vulnerable themselves. The abuser may only be involved in the Plymouth Argyle Football Club activity but could also be present in other areas of the Adult at Risk's life.

Abuse may be deliberate or result from not understanding the Adult at Risk's needs (commission or omission).

- Certain Adults at Risk may pose a risk of harm to others in Plymouth Argyle Football Club activities, either by deliberate behaviours, by failing to understand their responsibilities to others or the impact their behaviour may have upon others. On these occasions the Adult at Risk may need help and support to manage his or her behaviour in a suitable way or may need to have certain responsibilities removed from them. Safeguards, including risk assessments or sanctions, may need to be put in place to protect others.

- Adults who have been regarded as 'At Risk' previously may, due to a change in circumstances, no longer be considered to be an Adult at Risk (e.g. someone recovering from mental health issues). Where these adults are seeking positions of responsibility at Plymouth Argyle Football Club but have criminal records or issues from their past which are directly related to these periods of vulnerability, detailed risk assessments will be undertaken. Assessment of suitability for their new roles requires a specific knowledge base and sensitive handling. Whilst Plymouth Argyle Football Club promote a policy of inclusion, the risk assessments are conducted to measure the risk posed by someone who is recovering from a previous period of vulnerability.

The safeguarding of other Adults at Risk and Children will be considered by the club should the risk factors re-emerge and must be of paramount importance.

- Adults at Risk may be additionally vulnerable to the risk of abuse by failing to realise or report when they need additional or specific support in Plymouth Argyle Football Club activities. Staff should be vigilant when dealing with Adults at Risk to identify, wherever possible, where additional support and assistance may be required and/or is available or could be provided.

Types of Abuse.

The Care Act 2014 specifies the types of abuse to which Adults at Risk can be subjected, these include:

- **Physical abuse**

Includes assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint. This kind of abuse may often occur in a domestic violence setting.

- **Sexual abuse**

Includes rape, sexual assault or sexual acts to which the adult has not consented, is unable to consent due to the lack of Mental Capacity or was pressured into consenting. Indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo. Sexual abuse and exploitation can be perpetrated by one individual to another, and/or be perpetrated by an exploitative group who target individuals or a group of Adults at Risk.

Any sexual relationship that develops between adults where one is in a position of trust, power or authority in relation to the other (e.g. day centre worker/social worker/residential worker/health or care worker etc.) may also constitute sexual abuse.

Sexual exploitation of Adults at Risk can involve situations, contexts and relationships where an Adult at Risk receives 'something' (e.g. food, drugs, accommodation, alcohol, cigarettes, affection, gifts, money) by performing sexual acts, and/or others performing sexual acts upon them.

Sexual exploitation can occur through the use of technology without the person's immediate recognition. This can include being persuaded to post sexual images or videos on the internet or a mobile phone or being sent such an image by the person alleged to be causing harm.

Adults at Risk with learning disabilities can be particularly vulnerable to sexual exploitation and there may also be issues regarding their ability to consent.

It should be noted, however, that denial of a sexual life to consenting adults is also considered abusive practice and a potential breach of Human Rights (article 8).

- **Psychological/Emotional abuse**

Includes bullying, threats of harm or abandonment, deprivation of contact, humiliation, rejection, blaming, controlling, intimidation, coercion, indifference, harassment, verbal abuse (including shouting or swearing), cyber bullying, isolation or withdrawal from services or support networks. Psychological abuse includes the denial of a person's human and civil rights including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation.

- **Financial/Material abuse**

Includes theft, fraud, telephone and internet scamming, coercion in relation to an adult's financial affairs or arrangements, including wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Be alert to any unusual bank account activity where sums withdrawn cannot be accounted for, recent change of deeds or title of property, or significant sums of money borrowed and not repaid, or only repaid in part. A person living in poverty who cannot afford the basic necessities of life but has adequate income may be being deprived of money by others.

If the person managing an Adult at Risk's financial affairs is evasive, uncooperative or withholding money or care i.e. not acting in the persons "best interests" be alert to the possibility of financial abuse.

- **Neglect and Acts of Omission**

Neglect includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating.

Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves. Neglect and poor professional practice may take the form of isolated incidents or pervasive ill treatment and gross misconduct. Neglect of this type may happen within an institution or specific care setting such as a hospital or care home, or where care is provided within the adult's own home.

- **Self Neglect:**

Includes neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It is also defined as the inability (intentional or unintentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and wellbeing of the individual and sometimes to their community.

- **Discriminatory abuse**

Includes discrimination on the grounds of an individual's race, faith or religion, age, disability, gender, gender identity, sexual orientation and political views; racist, sexist, homophobic or ageist comments or jokes. It also includes comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse.

Hate crime is a form of discriminatory abuse, although will often involve other types of abuse as well, i.e. physical and psychological abuse. Hate crime is any criminal offence committed against a person or property that is motivated by hostility towards someone based on the adult's disability, race, religion or belief, sexual orientation, transgender. All hate crime should be reported to the Police.

Adults with learning disabilities can be particularly vulnerable to exploitation by persons purporting to be the Adult at Risk's friend. This is referred to as "Mate crime." The term is used to refer to abuse of an adult with care and support needs where the victim is being abused or exploited by one or more people who the victim wanted to be their friend, particularly in situations where the victim was otherwise isolated and lonely.

The person may find themselves being coerced, bullied or otherwise exploited on a regular basis. The Adult at Risk may fail to realise they are the victim of abuse, may choose not to report the abuse due to threats or intimidation or will tolerate the abuse rather than lose a "friend."

- **Domestic Abuse**

In 2013, the Home Office announced changes to the definition of domestic abuse as: “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 may include psychological, physical, sexual, financial, emotional abuse; so-called ‘honour-based’ violence; Female Genital Mutilation (FGM) and forced marriage.

Where domestic abuse has happened for a safeguarding response to be required under the Care Act 2014, the person must meet the usual three criteria:

- has care and support needs
- experiencing (or being at risk of) abuse or neglect
- being unable to protect themselves because of those needs.

Staff, however, should always report Domestic Abuse to the Safeguarding Manager who will then decide whether the circumstances will require a referral to the Safeguarding Adults Team or a referral to the Police or another agency.

- **Modern Slavery**

Includes slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Contemporary slavery takes various forms and affects people of all ages, gender and races. Someone is in slavery if they are forced to work, through mental or physical threat; owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse; dehumanised, treated as a commodity or bought and sold as 'property'; physically constrained or has restrictions placed on his/her freedom of movement.

Human trafficking involves the act/s of recruiting, transporting, transferring, harbouring or receiving a person through the use of force, coercion or other means; for the purpose of exploiting them. This can take the form of sexual exploitation.

If an identified victim of human trafficking is also an adult with care and support needs, the response will be co-ordinated under the Social Services Safeguarding Adults referral process.

The police are the lead agency in managing responses to adults who are the victims of human trafficking.

- **Institutional or organisational abuse**

Includes neglect and poor care practice within an establishment or specific care setting such as a hospital or care home, or where care is provided within adult's own home. This may range from one off serious incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. Organisational abuse is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights.

Organisational abuse occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice which affect the whole setting and deny, restrict or curtail the dignity, privacy, choice, independence or fulfilment of adults with care and support needs. Organisational abuse can occur in any setting where health or social care is provided.

- **Radicalisation**

Exposing an adult to extremist ideas which could lead to terrorism (see Preventing Radicalisation & Extremism guidance, page 47)

Factors associated with abuse

- people living with domestic violence
- people with carers under stress
- people living in unsafe communities
- people subject to unauthorised deprivation of liberty
- people who abuse drugs or alcohol

What to Look Out For

There are some situations that will alert you to the possibility that an adult is being abused. These are not proof in themselves that abuse has taken place, as each indicator may have a different explanation other than abuse, but you should report your concerns to the club Safeguarding Manager or DSO.

Indicators of Abuse

Below is a list of indicators of abuse of Adults at Risk. This list is not exhaustive and often some signs may be typical of more than one type of abuse:

Physical Abuse Indicators

- Any injuries that are not explained satisfactorily, such as:

Bruising which form a pattern which may correspond to the shape of an object or a person's hand.

Burns especially on "unlikely" areas of the body such as soles of the feet or palms of the hands.

- No explanation for injuries.
- Frequent injuries or unexplained falls.
- Subdued or changed behaviour in the presence of a particular person.
- Failure to seek medical treatment or frequent changes of GP.

Sexual Abuse Indicators

- Person exhibiting "untypical" self-harm.
- Urinary tract infections or sexually transmitted diseases that are not otherwise explained.
- Pain, itching or bleeding in genital or anal area.
- Bruising to thighs or upper arms.
- Bites on various parts of the body.
- Person exhibits significant change in sexual behaviour, language or outlook.
- Pregnancy in a person who lacks the capacity to consent to sexual intercourse.

Psychological/ Emotional Abuse Indicators

- Untypical ambivalence, deference, passivity, resignation
- Appears anxious, withdrawn or fearful, especially in the presence of specific people
- Low self-esteem.
- Person appears to lack the opportunity to make choices or have adequate privacy
- Untypical changes in behaviour or routines of daily living
- Person appears isolated and deprived of social contact
- Voices concerns about being abandoned or “put away”
- Bullying via social networking internet sites and persistent texting.

Financial Abuse Indicators

- General lack of money especially soon after benefits are claimed
- Person lacks belongings or services they can clearly afford
- Inadequately explained fall in living standards
- Inadequately explained withdrawals from bank accounts
- Inadequately explained inability to pay bills
- Person does not appear to possess items which are known to have been purchased
- Recent acquaintances expressing interest in the person or their money
- Inadequately maintained financial systems, when a person’s money is being managed by others, including a failure to produce receipts for major items.
- Susceptible to “Mate Crime”, befriended and then exploited for money, goods and accommodation.

Neglect & Self Neglect Indicators

- Person lives in accommodation which falls below minimum practical standards
- Person has inadequate heating and/or lighting

- Physical appearance, condition or general hygiene is poor
- Person appears to be malnourished or dehydrated
- Person is observed to be left in wet clothing
- Medical problems that go unattended
- Person does not appear to be taking prescribed medication
- Person is exposed to unacceptable risks

Discriminatory Abuse Indicators

- An adult may reject their own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices.
- An adult making complaints about service/s not meeting their needs.
- Physical attacks such as assault, damage to property, offensive graffiti or arson.
- Threat of attack including offensive letters, abusive or obscene telephone calls, groups hanging around to intimidate, and unfounded, malicious complaints.
- Verbal abuse, insults or harassment - taunting, abusive gestures and bullying.
- Offensive leaflets and posters, dumping of rubbish outside homes.

Domestic Abuse Indicators

- Bruises or injuries that look like they came from choking, punching, or being thrown down. Black eyes, red or purple marks at the neck, and sprained wrists are common injuries in violent relationships.
- Attempting to hide bruises with makeup or clothing.
- Making excuses like tripping or being accident-prone or clumsy. Often the seriousness of the injury does not match up with the explanation.
- Having few close friends and being isolated from relatives and co-workers.
- Having to ask permission to meet, talk with, or do things with other people.
- Having little money available; may not have credit cards or car.

- Having low self-esteem; being extremely apologetic and meek.
- Referring to the partner's temper but not disclosing the extent of the abuse.
- Having a drug or alcohol abuse problem.
- Having symptoms of depression such as sadness or hopelessness, or loss of interest in daily activities.
- Talking about suicide, attempting suicide. (Encourage this person to talk with a health professional).

Modern Slavery Indicators

- Adult is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else.
- The adult has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
- The adult looks malnourished, unkempt, or appears withdrawn.
- The adult has few personal possessions and often wears the same clothes.
- What clothes they do wear may not be suitable for their work.
- The adult is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them.
- They appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- Many victims will not be able to speak English.
- Fear of authorities.
- The adult perceives themselves to be in debt to someone else or in a situation of dependence.

Institutional or organisational abuse Indicators

- No flexibility in bedtime routine and/or deliberate waking.
- People left on a commode or toilet for long periods of time.
- Lack of personal clothes and belongings.
- Un-homely or stark living environments.
- Deprived environmental conditions and lack of stimulation.
- Inappropriate use of medical procedures such as enemas, catheterisation.
- Batch care - lack of individual care programmes.
- Illegal confinement or restrictions.
- Inappropriate use of power or control.
- People referred to or spoken to with disrespect.
- Inflexible services based on convenience of the provider rather than the person receiving services
- Inappropriate physical intervention.

Good practice and code of conduct

To ensure Adults at Risk have the most positive and safe experience when engaging with the club, all staff should display high standards of personal conduct and, by doing so, this will reduce the risk of potential allegations of abuse occurring.

Staff who undertake working with vulnerable groups need to understand and acknowledge the responsibilities and relationships of trust inherent in their role. Staff should maintain appropriate professional boundaries when working with vulnerable groups and must not use their status or standing to form or promote inappropriate relationships with individuals from those groups. Engaging in sexual contact with any child or Adult at Risk, with whom a member of staff comes into contact through their role, is considered a breach of trust and may lead to disciplinary action and/or a referral to the appropriate football authorities and/or statutory agencies.

Staff should adhere to the following guidance:

- Challenge unacceptable behaviour and report poor practice;
- Record and report any situation which may compromise the club's or the member of staff's own professional standing.
- Achieve the best level of supervision of vulnerable groups based upon; the need and capacity of the participants; nature of the activity and environment; risk assessments or intelligence information identifying potential behavioural or other issues; expertise and experience of the staff involved; utilising appropriate staffing ratios and mixed gender supervision wherever possible.
- Inappropriate contact initiated by a child or Adult at Risk should be recorded and reported to the Safeguarding Manager.
- Treat all Adults at Risk equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Promote fairness, confront and deal with bullying
- Do not accept gifts on a regular basis or any gift of significant value from an Adult at Risk. Avoid giving personal gifts to an Adult at Risk.
- Do not loan or borrow money or property from vulnerable groups.
- Listen carefully to Adults at Risk about his/her needs, wishes, ideas and concerns and take them seriously;
- Adhere to the club's Photography and Digital Images Policy.
- Maintain a safe and appropriate distance with adults at risk and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the Adult at Risk.
- Promote fairness, confront and deal with bullying
- If Adults at Risk must be supervised in changing rooms always ensure coaches etc. work in pairs;

- Adhere to the club's Transport Policy if required to transport Adults at Risk.
- Coaches to maintain their qualifications and professional development.
- Ensure a qualified first aider is in attendance or readily available when engaging in activities with vulnerable groups.
- On tours, ensure that adults should not enter an Adult at Risk's room unless there is a safety concern, in which case two adults should enter. Staff should also not invite Adults at Risk into their rooms;
- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of Adults at Risk;
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the Club's vision and values and be an ambassador for those values;
- Only make contact with vulnerable groups for professional reasons, if it is part of your role and in accordance with Club policy and guidance.
- Ensure Adults at Risk adhere to his/her relevant Code of Conduct, where appropriate.
- Adhere to the Club's Safeguarding Social Media Policy.
- Encourage Adults at Risk to take responsibility for their own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Accident Report Form;
- Recording safeguarding concerns on the PAFC Adults at Risk Report Form This list is not exhaustive.

Poor practice

Poor practice is behaviour that falls short of abuse but is nevertheless unacceptable. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed or unreported.

The following are regarded as poor practice and should be avoided by staff:

- Unnecessarily spending excessive amounts of time individually with an Adult at Risk away from others;
- Being alone in changing rooms, toilet facilities or showers used by Adults at Risk.
- Taking Adults at Risk alone in a car journey unless unavoidable in an emergency.
- Taking Adults at Risk to your home or in a place where they will be alone with you.
- Sharing a room with an Adult at Risk;
- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Allowing Adults at Risk to use inappropriate language unchallenged;
- Making sexually suggestive comments to an Adult at Risk, even in fun;
- Reducing an Adult at Risk to tears as a form of control;
- Allowing allegations made by an adult at risk to go unchallenged, unrecorded or not acted upon;
- Doing things of a personal nature that the Adult at Risk can do for themselves;
- Not recording or reporting safeguarding concerns.
- Having Adults at Risk engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram;
- Sending inappropriate text messages or social media messages to Adults at Risk.
- Engaging with Adults at Risk on 'one to one' personal electronic communications.

This list is not exhaustive.

Creating the atmosphere for someone to tell you what is wrong

The Event Lead of each PAFC activity involving Adults at Risk will ensure that the participants know how to get help, how they can report abuse, who to report it to and what response they can expect.

Some people who have been abused will be able to speak to someone about it and want action to be taken. Others may be very reluctant to talk about the experience. People with Mental Health problems are particularly under-represented in safeguarding referrals.

Common reasons for reluctance to disclose abuse:

- It may just be too painful emotionally to talk about what happened. Feelings of shame and embarrassment often inhibit people reporting concerns.
- There may not be an opportunity to see someone who is trusted, privately.
- There may be anxiety about repercussions from the perpetrator or others if the abuse is reported.
- There may be a worry about “where it will all end”, for example if the police are told, or perhaps a fear of going to court.
- The abused person may just be prepared to put up with it.
- Communication and language may be an inhibitor.
- The person may not recognise an experience to be abusive if their previous life experiences have been confusing.
- Not being believed.
- Effects of stigma.
- Powerlessness, lack of choice, power differences.
- Fear of a continuing oppressive regime.
- The perceived victim could have confused feelings towards the abuser.
- Afraid they will not be taken seriously.

It is very important, if abuse is suspected, to try and create the opportunity for the person to disclose what is happening. It is crucial to give participants the confidence to know that they will be listened to.

The following guidance should be adopted by PAFC staff as good practice:

- Identify a named person responsible for safeguarding for each team or activity who is a familiar face to the participants. This measure is intended to be empowering for the Adults at Risk participating.
- Where abuse is suspected, identify the member of staff the person appears to like or trust the most. Create an opportunity for the person to share their concern with an identified staff member.
- Because the person might be worried about losing control of the situation if they tell, it might be helpful to give assurances that after disclosing abuse the person is always asked what they wish to do about it. Respect will be given to their wishes and you should always attempt to obtain their consent to report the circumstances to the club Safeguarding Manager initially. There are various circumstances where it will be necessary to report a concern against a person's wishes, particularly when others would be left at risk or a criminal offence has occurred. Do not guarantee that you will keep what they say to you to yourself.

Key points to remember about disclosure

- Many incidents of abuse or crimes only come to light because the abused person themselves tells someone.
- Disclosure may take place many years after the actual event or when the person has left the setting in which they were afraid.
- Even if there is a delay between the actual event and the disclosure - you should demonstrate to the person that you take what they are saying seriously.
- You must also be aware that the person may not appreciate the significance of what they are sharing. They may not realise or accept they are being abused.

Disclosures & Concerns of Abuse

The possibility of abuse can come to light in various ways, for example:

- An active disclosure of abuse by the adult
- Witnessing abuse or suspected abuse occur.
- A passive disclosure of abuse where someone's attention is drawn to the symptoms of the abuse
- A growing awareness that "something is not right"
- An allegation of abuse by a third party
- A complaint or concern raised by an adult or a third party who doesn't recognise that it is abuse.

Responding to Adult Safeguarding Concerns – a summary of what to do.

There are some key responsibilities and actions for PAFC staff who are alerted to suspected abuse of an Adult at Risk. These responsibilities must be addressed on the same day as the Concern is raised, wherever possible.

Always attempt to secure the adult at risk's consent before documenting the concern

Explain to the Adult at Risk that you will record what they tell you and this will be shared with the club Safeguarding Manager or DSO in the first instance.

Whatever the source of the information it must be treated seriously, recorded and reported to the club Safeguarding Manager or DSO using the PAFC Adult at Risk Report form (available on the PAFC website).

Every member of PAFC staff has a duty to report safeguarding concerns to the club Safeguarding Manager or DSO in the first instance, except in emergency situations where anyone can make a referral to Adult Social Care or the Police if they are concerned for an Adult at Risk's immediate safety

Managing the disclosure - Do's and Don'ts

If someone discloses abuse to you:

- Stay calm and try not to show shock.
- If the person is injured or not yet safe, take immediate action to help them e.g., dialling 999 for police or ambulance.
- Listen carefully rather than question directly.
- Use the following as a guide to establish the nature and circumstances of the allegation:

WHO? – Name/s of who is/are involved.

WHAT? – What happened?

WHERE? – Where did it happen?

WHEN? -When did it happen?

- Be sympathetic and offer reassurance.
- Write down, as soon as you are able, what was said by the person disclosing the information (in their words as far as possible) and any other relevant information.
- Where appropriate, record a description and the location of any bruises, cuts or abrasions.
- In cases, such as sexual assault, where forensic evidence from a scene or the victim's body or clothing may be available then staff must attempt to preserve any such evidence e.g. locking a room to prevent other people disturbing the scene, advising the Adult at Risk not to wash, go to the toilet or change clothes (if the assault is relatively recent). Be aware of the possibility that medical evidence might be needed.
- Be mindful of documentary or other evidence, which may be present on mobile phones, computers or other devices which may need to be retained.

Advice should be sought from the Safeguarding Manager or DSO as to the preservation of evidence in such cases, pending police involvement.

What to record?

Consider the following points, but the PAFC Adult at Risk Concern form will guide you through the recording process:

- Name, date of birth, address and safe contact telephone number of the alleged victim
- Reason the Adult at Risk is in need of support e.g. learning disability, alcohol/drug use, physical or cognitive disability etc.
- Has the Adult at Risk consented to a Safeguarding referral?
- If the Adult at Risk has not consented then explain their grounds for refusal.
- Is the Adult at Risk aware a Safeguarding Referral may be made to the Local Authority?
- Details of the disclosure or concern. Describe what happened and any injuries or consequences for the victim.
- Category of Abuse E.g. Neglect, Financial abuse, Sexual abuse etc.
- Time, Date and Location where the abuse/suspected abuse took place.
- Provide details of any concerns or issues in relation to the capacity of the Adult at Risk.
- Is the Adult, at risk of further harm/abuse?
- Details of the Adult at Risk's Carer, Supporter or Advocate if applicable and if they are aware of the circumstances of the referral.
- Are there any concerns in relation to Domestic Violence for the Adult at Risk?
- State any specific needs of the Adult at Risk e.g. interpreter, access/mobility assistance, visually impaired etc.
- Details of any children who could be at risk as a result of the circumstances of this incident/concern and, if so, specify if anyone has been contacted regarding the potential risk to those children.
- How does the Adult at Risk want the matter to be dealt with?
- Have any safeguarding measures already been put in place e.g. Adult at Risk is not returning to family home, member of staff suspended etc.

- Name, date of birth, address of the alleged perpetrator and their relationship to the Adult at Risk.
- Are there any known issues with the suspects capacity?
- Who you are and how you are involved
- Any action taken
- Who else relevant is involved?

Keep the information as concise and factual as possible.

If it is appropriate to include an opinion or third party information, ensure that this is made clear.

Tell the person:

- That they did right to tell you.
- You are treating this information seriously.
- That you will only tell the people who need to know.
- What you are going to do about the concern and explain that it is your responsibility to report the information provided to the club Safeguarding Manager or DSO immediately who may wish to speak to them further.

Do not promise confidentiality or agree to your conversation being “off the record” as it may be necessary, depending on the circumstances, to share what the Adult at Risk says with a statutory agency regardless of their wishes.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

When there is a risk of Immediate Harm

Staff should take steps to ensure the individual's immediate safety. Contact the Police if the threat of harm is imminent.

Report the circumstances to the club Safeguarding manager or DSO immediately.

If the circumstances are referred to the Police or Social Services Adult Safeguarding Team they will assess the risk to the victim and develop a plan to address any ongoing risk dependent upon the level of abuse reported.

It is essential that initially, whatever the nature of the suspected abuse, the Adult at Risk is separated from the person who is or is thought to be producing the threat.

You may need the assistance of colleagues to facilitate this.

It is important that disruption to the life of the victim is kept to a minimum, therefore, if it is possible for the alleged perpetrator to leave the scene, this is normally the preferred option. However, if it is not achievable or appropriate in the circumstances, an alternative safe place should be sought as the immediate safety of the victim is the highest priority.

Duty to Report & Consent Issues

The member of staff dealing should obtain the Adult at Risk's consent to allow the club to share the information they have provided with statutory agencies, such as the Social Services Safeguarding Adults Team or Police.

There is no requirement to get the Adult at Risk to provide written consent but the member of staff dealing should record on the PAFC Adult at Risk Report form whether verbal consent was given or refused by the Adult at Risk.

The PAFC Adult at Risk Report form is an internal document, designed to record the information necessary to formulate a referral, when necessary, to an outside statutory agency but also to accurately record any concerns or allegations in respect of Adults at Risk during their contact with the Club and to identify any potential patterns of abuse within the organisation.

The club Safeguarding Manager will determine whether the concern should be referred to an outside agency, with or without the Adult at Risk's consent to do so. The adult's wishes will be made clear throughout the referral process.

The safeguarding principle of proportionality should underpin decisions about sharing information without consent, and decisions will be on a case-by-case basis.

If it is necessary to share information with Statutory Agencies

Individuals may not give their consent to the sharing of safeguarding information for several reasons. For example, they may be frightened of reprisals, they may fear losing control, they may not trust statutory agencies or they may fear that their relationship with the abuser will be damaged. Reassurance and appropriate support along with gentle persuasion may help to change their view on whether it is best to share information.

- explore the reasons for the person's objections – what are they worried about?
- explain the concern and why you think it is important to share the information
- tell the person who you would like to share the information with and why
- explain the benefits, to them or others, of sharing information – could they access better help and support?
- discuss the consequences of not sharing the information – could someone come to harm?
- reassure them that the information will not be shared with anyone who does not need to know
- reassure them that they are not alone and that support is available to them.

If the person cannot be persuaded to give their consent then, unless it is considered dangerous to do so, it should be explained to them that the information will be shared without their consent. The reasons should be given and recorded.

If it is not clear that information should be shared outside the organisation, a conversation can be had with safeguarding partners in the police or local authority without disclosing the identity of the person in the first instance. They can then advise on whether full disclosure is necessary without the consent of the person concerned.

It is very important that the risk of sharing information is also considered. In some cases, such as domestic violence or hate crime, it is possible that sharing information could increase the risk to the individual. Safeguarding partners need to work jointly to provide advice, support

and protection to the individual in order to minimise the possibility of worsening the relationship or triggering retribution from the abuser.

It is very important that the risk of sharing information is also considered. In some cases, such as domestic violence or hate crime, it is possible that sharing information could increase the risk to the individual. Safeguarding partners need to work jointly to provide advice, support and protection to the individual in order to minimise the possibility of worsening the relationship or triggering retribution from the abuser.

When can information be shared without consent?

If a person refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with statutory agencies then their wishes should be respected. However, there are circumstances where such a decision can be overridden, which includes:

- The person lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the [Mental Capacity Act](#)
- Other people are, or may be, at risk, including children
- Sharing the information could prevent a crime
- The alleged abuser has care and support needs and may also be at risk
- A serious crime has been committed.
- Staff are implicated
- The person has the mental capacity to make that decision but they may be under duress or being coerced
- The risk to the individual is unreasonably high and may require a multi-agency risk assessment conference. (MARAC)
- A court order or other legal authority has requested the information.

Making a decision not to refer

If the Adult at Risk has capacity and does not consent to a referral, there are no public or vital interest considerations, and the decision is not to share safeguarding information with other safeguarding partners, or not to intervene to safeguard the person, then PAFC will:

- Support the person to weigh up the risks and benefits of different options
- Ensure they are aware of the level of risk and possible outcomes
- Record the reasons for not intervening or sharing information
- Where possible, regularly review the situation

Domestic abuse cases may be referred to a multi-agency risk assessment conference where appropriate. Cases of domestic abuse can also be referred to local specialist domestic abuse services.

24-hour National Domestic Violence Freephone Helpline 0808 2000 247 Run in partnership between Women's Aid and Refuge

Where there is no emergency

Where there is no emergency, and the complainant, or any other person, will not be put at risk of harm because of a delay in reporting the concern to an outside agency, then there may be an opportunity to check out the Adult's wishes in relation to the concern if they are uncertain how to proceed.

The following guidance should be followed:

- Liaise with the club Safeguarding Manager who will advise whether a delay in making a referral to a statutory agency can be justified.
- Establish who the victim would most like to talk to about the matter in a follow up interview.

- The member of staff chosen to carry out the follow up interview must familiarise themselves with all possible options and prior to the interview, seek advice regarding the potential consequences of each option for the victim.
- It is important to remember the interview may only be about establishing what the victim wishes to do about the incident, not necessarily about discussing the incident itself.
- This process will allow the victim time to consider the options and if there is uncertainty, offer to meet again.
- It is crucial that the member of staff dealing with the concern, in light of any new information being given to them, regularly reviews their risk assessment of the situation so that the appropriate safeguarding measures are in place and to ensure no other persons linked to the disclosure have become at risk of harm.

Role of staff supporting the Adult at Risk

Members of staff involved in supporting the Adult at Risk who has been harmed, or may be at risk of harm, have a key role in making sure that the procedures within this guidance are followed and that the victim is properly advised and supported.

If a number of staff are involved, it may be convenient for one person to take the lead. This is a matter for the staff or Safeguarding Team to agree upon in the light of the individual circumstances.

The role of the staff supporting the alleged victim includes the following:

- Ensuring the continued safety of and support to the Adult at Risk.
- Wherever possible, liaising with colleagues who have been involved to gather all the available information together.
- Ensuring that evidence has been preserved.
- Reporting the matter to the Safeguarding Manager or DSO at the earliest opportunity.

- Making a written record of the incident using the PAFC Adult at Risk Report form, (available on the PAFC website) and forwarding the report to the club Safeguarding Manager or DSO dealing asap.

It is not part of the role of the staff supporting the Adult at Risk to commence an investigation into the incident but it is important that you make an accurate record of whatever the victim tells you. Your records may later be disclosed in Criminal or Civil proceedings and you may become an important witness in the case.

Role of the Safeguarding Manager and Safeguarding Officer

When encountering a safeguarding concern or incident involving an Adult at Risk, then the Safeguarding Manager, DSO or Event Safeguarding Officer for the specific activity in which the incident or concern arises should be consulted for advice on how to manage the incident. In the absence of the club Safeguarding Manager or Safeguarding Officer, or if s/he is implicated in the abuse, an alternative Safeguarding Officer must always be identified to deal with the matter.

The Safeguarding Manager/ Safeguarding Officer is responsible for the following:

- Directly managing and supporting the staff involved in the situation.
- Ensuring that action taken is effective in providing immediate and ongoing protection to the Adult at Risk.
- Ensuring that practical and emotional support is available, according to need.
- Reporting the incident to, and any necessary continued liaison with, the Local Authority's Safeguarding Adults Team.
- Reporting the incident in writing to the Safeguarding Lead.
- Reporting the incident to the League / F.A. if appropriate, within 24 hours.
- Liaising with the club Head of HR, who may invoke the Suspension or Disciplinary procedures if appropriate.

Incidents or Allegations involving PAFC staff

Where there is a suspicion that an Adult at Risk has been abused by a member of PAFC staff, or there has been an episode of poor practice involving an Adult at Risk, the incident or allegation should be reported using the same procedures, set out in this guidance, as when reporting any Adult at Risk safeguarding concern.

Informing the League/FA

On making any referral of an allegation of or incident of suspected abuse towards an Adult at Risk to any external agency (including the Police, the Local Authority or the DBS) or when a third (or subsequent) incident or allegation of 'poor practice' (as defined in Affiliated Football's Safeguarding Procedures) in relation to a Child or Adult at Risk involving the same member of Staff occurs; the Safeguarding Manager shall notify the club Safeguarding Lead in writing and ensure that the Safeguarding Lead is kept fully apprised of the progress of the referral and any subsequent investigation or action.

The club will notify the League and the F.A. of the referral or incident of repeated poor practice (through the submission of the Affiliated Football Safeguarding Referral Form) and provide them with appropriate updates.

Internal enquiries and Suspension

- The Safeguarding Manager (or Safeguarding Officer dealing) will make an immediate decision in conjunction with the Chief Executive and Head of Human Resources about whether any individual accused of harm, inappropriate behaviour or abuse should be temporarily suspended pending further police and social services enquiries.
- The FA/ League will be informed by the club Safeguarding Manager of any serious safeguarding concern or complaint in order that they may consider the risk posed across football and impose a working ban where appropriate.

- Should the investigation reveal any breaches of the club's Discipline Code of Conduct then those matters will also be subject of an internal investigation and may result in Disciplinary Action/ Dismissal of the individual.
- Irrespective of the findings of any Social Services or Police enquiries the Head of HR and Safeguarding Manager, in conjunction with legal advisors, will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the Police. In such cases, the Head of HR, Safeguarding Manager and the legal advisors must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true.
- The welfare of the Adult at Risk should remain paramount.
- If Plymouth Argyle Football Club decides to withdraw permission for a member of staff to engage in regulated activity with children and/or Adults at Risk PAFC is legally obliged to refer that person to the Disclosure and Barring Service when it is also believed that member staff has caused harm or poses a future risk of harm to vulnerable groups. This includes situations when Plymouth Argyle Football Club would have taken the above action, but the person was re-deployed, resigned, retired, or left.
- If, following consideration, the allegation is clearly behaviour which amounts to poor practice; the Safeguarding Manager and Head of HR will deal with it as a misconduct issue.
- If the allegation relates to poor practice by the Safeguarding Manager, or if the matter has been handled inadequately and concerns remain, it should be reported to the Chief Executive who will decide how to deal with the allegation and whether to initiate disciplinary proceedings.

Plymouth Argyle Football Club will assure that all staff/volunteers are fully supported and protect anyone, who in good faith reports his or her concerns that a colleague is, or may be, harming or abusing an Adult at Risk. The club's Whistleblowing (Public Interest Disclosure) Policy will apply to ensure this.

The club has the power, as part of the Plymouth Argyle Football Club Disciplinary procedures, to issue a suspension where any one or more of the following applies:

- i). The individual fails to comply with any part of Plymouth Argyle Football Club's DBS Processes.
- ii) The individual has been convicted of, or made the subject of caution for, a serious sexual, violent offence or any other offence that Plymouth Argyle Football Club believes to be relevant to the care of vulnerable groups.
- iii). Following an assessment of the circumstances of the complaint, incident or information received, the club is satisfied on the balance of probabilities that the individual poses or may pose a risk of harm to Adults at Risk or other vulnerable group.

Capacity - The statutory principles

The Mental Capacity Act 2005 sets out five statutory principles

- Every Adult has the right to make their own decisions and must be assumed to have capacity to do so unless it is proved otherwise. This means that you cannot assume that someone cannot make a decision for themselves just because they have a medical condition or disability.
- A person is not to be treated as unable to make a decision unless all practical steps to help him/her to do so have been taken without success.
- A person is not being treated as unable to make a decision merely because s/he makes an unwise decision. People have the right to make decisions that others might regard as unwise or eccentric. You cannot treat someone as lacking capacity for this reason. Everyone has their own values, beliefs and preferences which may not be the same as those of other people.
- An act done or decision made, for or on behalf of a person who lacks capacity must be done, or made, in their best interests
- Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action

It is not for a member of Plymouth Argyle Football Club staff to decide whether an Adult at Risk lacks Capacity, but it is useful for professionals to have an understanding of the notion of Capacity explained below:

- Capacity - The ability to make a decision at a particular time.
- The term "lacks capacity" means a person who lacks capacity to make a particular decision or take a particular action for themselves at the time when the decision or action needs to be taken. This reflects the fact that some people may be unable to make some decisions for themselves but will have capacity to make other decisions. For example, they may be able to make small decisions about everyday matters such as what to wear or what to eat but lack capacity to make more complex decisions about financial matters
- It may be that a person who lacks capacity to make a decision at a certain time

may be able to make that decision at a later date - this may be due to illness or accident

The two-stage test for assessing capacity

To decide whether an individual has the capacity to make a particular decision, you must answer two questions:

Stage 1: is there an impairment of or disturbance in the functioning of a person's mind or brain? If so,

Stage 2: is the impairment or disturbance sufficient that the person lacks the capacity to make a particular decision?

The Mental Capacity Act states that a person is unable to make their own decision if they cannot do one or more of the following four things:

- **understand** information given to them
- **retain** that information long enough to be able to make a decision
- **weigh up** the information available to make the decision
- **communicate** their decision – this could be by talking, using sign language or even simple muscle movements such as blinking an eye or squeezing a hand.

Unwise Decisions

When considering referring Adult at Risk concerns to outside agencies staff should be aware of the following guidance:

- A person with capacity is entitled to make unwise decisions relating to abuse.
- If a person making an unwise decision lacks capacity to make that decision, then a decision needs to be made by others in the person's best interests.
- 'Best interests' decisions must comply with the Mental Capacity Act.
- It may be necessary and justified to contest an unwise decision if it appears to be related to exploitation, coercion, grooming, undue influence or duress.
- Individuals should be given the opportunity to disclose undue influence and seek appropriate support.
- If a person with capacity is making an unwise decision that puts others at risk then it may be justified to share information without their consent.

Other Considerations

In some cases, a doctor or other professional expert will have carried out a formal assessment of an Adult at Risk's Capacity. Where background information such as this is available, for example from a partner agency, the information should be stored confidentially.

In most areas, an Independent Mental Health Capacity Advocate (IMCA) is appointed to assist a person who is judged to lack capacity.

Family, friends, carers or other professionals may be able to offer support and assistance where appropriate, with the Adult at Risk's consent.

The Data Protection Act 1998

The Data Protection Act 1998 sets out the parameters for sharing information appropriately and safely.

The Basic Principles:

Any personal information should be shared on the basis that it is:

- necessary for the purpose for which it is being shared
- shared only with those who have a need for it
- accurate and up to date
- shared securely and in a timely fashion
- not kept for longer than necessary for the original purpose.

GDPR (General Data Protection Regulation).

The club may disclose personal information to third parties to comply with a legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

See the clubs Privacy Policy available on the pafc.co.uk website.

Vital Interest

'Vital interest' is a term used in the Data Protection Act to permit sharing of information where it is critical to prevent serious harm or distress, or in life-threatening situations. If the only person that would suffer if the information is not shared is the subject of that information, and they have mental capacity to make a decision about it, then sharing it may not be justified.

Other Associated Policies:

1. Safer Recruitment and Selection Policy
2. Dignity at Work Policy
3. Equal Opportunities, Diversity and Inclusion Policy.
4. Whistleblowing (Public Interest Disclosure) Policy
5. Health and Safety Policy.
6. Safeguarding Social Media Policy.
7. Excursions and Events Policy.
8. Photography and Digital Images Policy
9. Disciplinary Procedure.
10. Grievance Procedure
11. Modern Slavery and Human Trafficking Policy.
12. Preventing Radicalisation & Extremism (see below)

Photography and Digital Images

All images of Adults at Risk participating in PAFC events and activities are taken by club designated or approved photographers, who have been briefed by a member of the Media and Communications Department, to ensure that the activity being photographed or filmed is done so in an appropriate way and manner. Before taking images of Adults at Risk, the Adult at Risk's consent (or if they do not have capacity, his/her personal assistant's consent) is sought in writing at the start of the season or prior to a specific activity or event.

Please note: due to practical limitations, the above guidance does not apply when the Adult at Risk enters solely as a spectator Home Park, including all locations owned, occupied or utilised by the club, as by entering they also give consent to their image being captured/used by Plymouth Argyle Football Club. This is in line with existing club and EFL Ground Regulation 24.

In line with the Mental Capacity Act (2005), the club will always ensure the best interests of the adult at risk and least restrictive option is considered, which may include the adult at risk not being photographed or filmed in club activities or events.

(For full guidance see the PAFC Photography and Digital Images Policy, detailed in the PAFC Safeguarding Children Policy and Procedures available on the pafc.co.uk website)

Preventing Radicalisation & Extremism

The current threat from Terrorism and Extremism in the United Kingdom is substantial and can involve the exploitation of vulnerable people. In line with guidance from the Home Office, Plymouth Argyle Football Club has a zero-tolerance approach regarding violent or extremist behaviour and seeks to provide a safe environment for all participants.

If there is an immediate perceived threat to the person's safety, staff safety or public safety, the police must be contacted immediately.

All PAFC staff working in contact with vulnerable groups must complete mandatory PREVENT and Channel awareness training so that they can identify and respond appropriately to potential extremist behaviour.

If staff have any concerns that a person may be at risk of radicalisation or is exhibiting extremist views or behaviour then they should report those concerns to the club Safeguarding Lead, Safeguarding Manager or DSO who will share the concerns with the relevant outside agencies.

Referrals should clearly state that a “PREVENT REFERRAL” is being made and should be sent to:

- Adults at risk: referral to be made to the Local Authority Safeguarding Adults Team www.plymouth.gov.uk/safeguarding

Referrals regarding an adult who does not meet the definition of an Adult at Risk should be made to Devon & Cornwall Police.

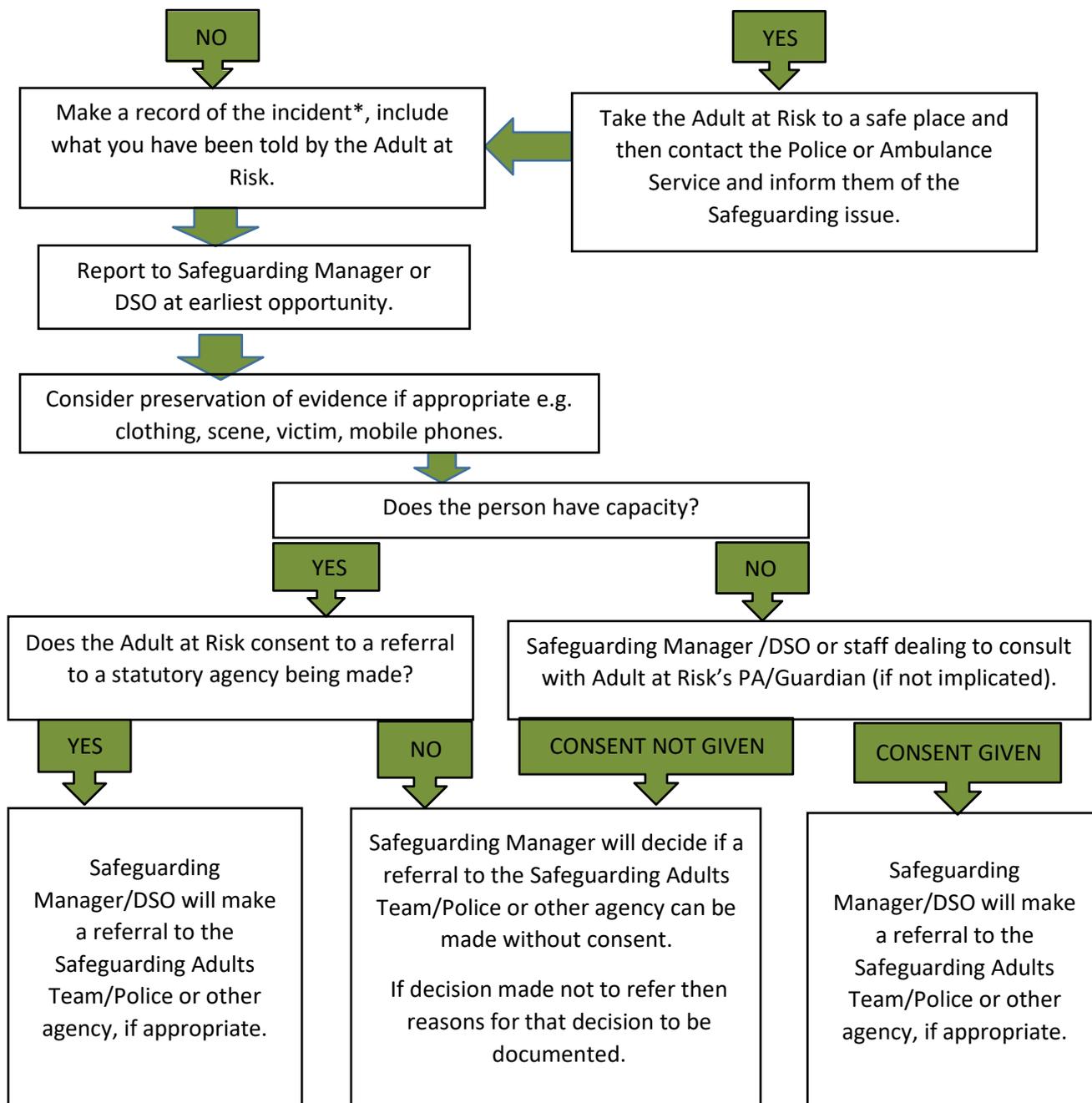
Tel: 101 in non-emergency cases and 999 in cases of Emergency.

Each case should be kept as confidential as possible; therefore, information is shared on a ‘need to know’ basis only.

Allegation or Incident of Abuse of an Adult at Risk

Stay Calm – Reassure – Take Seriously – No Promises – Follow Guide

Is the Adult at Risk in need of Urgent Medical Treatment? Or in Immediate Risk of Harm?



Whatever the circumstances the person receiving and reporting the allegation or incident must submit a written record, using the PAFC Adult at Risk Report form*, and submit the form to the Safeguarding Manager at the earliest opportunity.

*The PAFC Adult at Risk Report form is available on the PAFC website.

Allegation of Abuse or Poor Practice by a Member of PAFC Staff against an Adult at Risk

Stay Calm – Reassure – Take Seriously – No Promises – Follow Guide

Is the behaviour an alleged breach of the club Safeguarding Policy or Code of Conduct?

Is the matter serious enough to potentially be considered a criminal offence?

NO

YES/UNSURE

Report to Safeguarding Manager at earliest opportunity, using the PAFC Adult at Risk Report form*,

Report to Safeguarding Manager or DSO, using the PAFC Adult at Risk Report form*, at earliest opportunity, who will assess the circumstances and report the matter to Social Services and /or Police, F.A./ League if appropriate. The Safeguarding Manager will inform the Chairman and the Head of HR. Suspension of the member of staff to be considered.

Safeguarding Manager & Head of HR will investigate and deal with it as a potential misconduct issue and consider suspending the member of staff.

Safeguarding Manager to refer circumstances to FA/ League if appropriate.

If the allegation relates to the Safeguarding Manager report to the Chairman who will assess the circumstances and refer to Social Services and/ or Police, F.A./ League if appropriate.

If concerns remain refer to Chief Executive who will direct action to be taken, in conjunction with the Head of HR and Safeguarding Manager

Possible Discipline outcomes:
No case to answer.
Further training & support needed.
Warrants Advice/Sanctions/Warning as to future conduct.
Dismissal.
Referral to DBS/ Inclusion on DBS Barred list.
Working ban imposed by the F.A

Possible outcomes:
Police Investigation
Criminal Proceedings/Conviction.
If NFA by Police, then referral back to HR.
Civil Proceedings.
Dismissal.
Inclusion on DBS Barred list.
Working ban imposed by the F.A.

*PAFC Adult at Risk Report form is available on the PAFC website.

Useful contacts:

British Deaf Association Tel: 020 7405 0090 e-mail - helpline@bda.org.uk

The British Deaf Association is the UK's largest national organisation run by deaf people for deaf people. It represents the deaf community, a community united by shared experiences, history and a common language.

Disabled Living Foundation Tel: 020 7289 6111 e-mail info@dlf.org.uk

Provides specialist advice for people with disabilities and their carers. It has a national telephone helpline service (0845 130 1977), and equipment centre (020 7289 6111), factsheets, publications shop and training and events

National Autistic Society Tel: 020 7833 2299 e-mail - nas@nas.org.uk

The charity's objective is to provide education, treatment, welfare and care to people with autism and related conditions.

Rape Crisis Federation of England and Wales Helpline: 0808 802 9999 e-mail -

info@rapecrisis.co.uk

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout England and Wales.

Survivors UK Supporting male survivors of Rape and Sexual abuse. Information and online chat via: sms 020 322 1860 Whatsapp 074 9181 6064 www.survivorsuk.org

The FA/NSPCC Footballers Helpline: Offers advice and support to anyone who has experienced sexual abuse as a young footballer. 0800 023 2642 www.nspcc.org.uk

The PFA (Professional Footballer's Association) 24-Hour Helpline 07500 000777 For issues related to mental health or well-being, such as stress or depression.

Email the PFA at: WELLBEING@THEPFA.CO.UK

NAPAC National Association for people abused in childhood. National survivors Helpline free from both landline & mobiles Tel 0808 801 0331 www.napac.org.uk

Royal National Institute for the Blind Tel: 020 7388 1266 0845 766 9999 (Helpline)

helpline@rnib.org.uk

The Royal National Institute for the Blind offers information, support and advice to over 2 million people with sight problems. It fights for equal rights and funds research

PAFC Chaplain Arthur Goode arthur@arthurgoode.uk

Turning Point Tel: 020 7481 7600 info@turning-point.co.uk

Turning Point has over thirty years of experience working with those most excluded in our society. They operate a range of projects throughout the country in the areas of drug and alcohol abuse, mental health and learning disabilities.

24-hour National Domestic Violence Freephone Helpline 0808 2000 247 Run in

partnership between Women's Aid and Refuge

Citizens Advice Providing advice of support to the general public, on a variety of matters including allegations of abuse. Tel 03444 111 444 Text Relay 03444 111 445 www.citizensadvice.org.uk

The following legislation and national and local guidance has been used to inform this policy:

Safeguarding Vulnerable Groups Act 2006 Care

Act 2014

Modern Slavery Act 2015 Mental

Capacity Act 2005

The Human Rights Act 1998.

Achieving Best Evidence 2011.

Equality Act 2010.

The Protection of Freedoms Act 2012.

Safeguarding Rules and Regulations.

GDPR (General Data Protection Regulation).

EFL Guidance to Member Clubs and Community Trusts 2017

POLICY UPDATE

This policy will be reviewed annually, or in light of any changes in legislation or guidance, or following any learning outcomes from safeguarding incidents, concerns or allegations.

Author	Nikki Francis	Owner	PAFC
Document Title	Safeguarding Adults at Risk Policy	Version Number	1.0
Approved by	Board	Approved Date	
Review frequency	Annually	Reviewed Date	First Issue
Circulation	Print, Intranet	Sensitivity	Public

Version History

Version	Amendment	By	Date
1.0	First issue	Nikki Francis	April 2019