



# **PAFC**

# **SAFEGUARDING ADULTS**

# **AT RISK POLICY**

Plymouth Argyle is committed to safeguarding and promoting the welfare of children, young people and adults at risk and expects all staff, volunteers and visitors to share this commitment.

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## **Foreword**

This Safeguarding Adults at Risk Policy reflects the safeguarding ethos of PAFC. We are committed to providing a safe, positive, inclusive experience for all people who come into contact with the PAFC family. The Board of Directors endorse this document as part of the club's constitution. Plymouth Argyle are committed to safeguarding and promoting the welfare of all young people and adults at risk, and expects all staff, volunteers and visitors to share this commitment.

This adults at risk policy is fundamental to safeguarding and promoting the welfare of every person. We work in partnership with statutory agencies, football regulators, and voluntary sector specialists, to ensure the safety and protection of vulnerable groups. Together, in combination with all our safeguarding policies and protocols we provide robust safeguarding procedures for everyone involved in delivering our activities.

***Andrew Parkinson***

August 2021

Chief Executive Officer

On behalf of PAFC board of directors

## **Policy Purpose**

This safeguarding policy reflects the safeguarding ethos at PAFC. Plymouth Argyle is committed to safeguarding and promoting the welfare of young people and adults at risk and expects all staff, volunteers and visitors to share this commitment.

This safeguarding policy should be read in conjunction with the main 'PAFC Safeguarding and Child Protection Policy' which is a point of reference for all policies and reference material used by PAFC. Other related policies and protocols are listed below.

Our safeguarding policies aim to promote the safety and wellbeing of children, the young and adults at risk and to provide assurance to parents, carers and other parties.

By implementing this policy across all PAFC operations, all members of staff will understand that they have a responsibility to work together to safeguard all people that may be vulnerable and that:

- Everyone's safety and welfare is the first consideration
- All people have a right to enjoy sport, and associated activities of PAFC, free from abuse and all forms of bullying, harassment and discrimination
- All individuals and organisations involved with PAFC have responsibilities for the welfare of everyone in our activities; and
- All individuals and organisations involved with PAFC must act in accordance with the law in relation to such matters

For PAFC operations, it also means; supporting 'safer recruitment' processes through promoting best practice for those working amongst our staff, supporting them, ensuring staff are competent, well-managed, challenged if poor practice occurs, and taking action when a concern arises.

## **Who This Policy Applies to**

This policy and its operating principles, apply to all staff and volunteers (including all players) of PAFC, irrespective of the type of contract on which they are employed or the hours and days that they work, or the nominated location at which they work. The policy also applies to any other individual, worker, contractor, commercial partners, licence holder, consultant who is engaged by, or does work on behalf of, or for, PAFC. This policy does not form part of any employee's contract of employment.

For the avoidance of doubt this policy does not apply to the ACT; who operate in accordance with their own policies.

## **Key Safeguarding Terminology and Definitions**

- PAFC / the Club – Plymouth Argyle Football Club. Any property or training ground belonging to or where PAFC operate, or where their activities occur.
- ACT – Argyle Community Trust.
- FA – Football Association
- EFL – English Football League
- CEO - Chief Executive Officer
- Staff – paid or unpaid workers, agency or third-party workers, volunteers; who provides a service

- DSO – Designated Safeguarding Officer
- SSM – Senior Safeguarding Manager
- DLO – Disability Liaison Officer
- My Concern – The PAFC confidential safeguarding management system
- LADO – Local Authority Designated Officer
- The Academy - The standalone Academy department within PAFC responsible for nurturing and developing PAFCs future generations of players.
- Adult at Risk – Any person aged 18 or over; who may be in need of care services by reason of mental or other disability, age or illness; and who may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation
- Safeguarding - refers to the actions we take to ensure all people are safe from harm when involved in our clubs and activities.
- Child Protection - is a set of activities that are required for specific children who are at risk/or are suffering from significant harm.
- Abuse - refers to the acts of commission or omission that lead to a person experiencing harm.
- Harm - refers to the negative impact or consequences upon the person of those actions.
- Violence - refers to “all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.”

## **Related PAFC Policies and Protocols**

- Safeguarding Child Protection Policy
- Easy Read Safeguarding Policy
- Child friendly Safeguarding Policy
- Prevent Policy
- Safeguarding EIA
- Code of Conduct
- Confidentiality Agreement
- Self-Declaration
- Safer Recruitment Policy
- Staff Induction Policy
- Staff Handbook
- DBS Single Central Record
- 'My Concern' safeguarding case management system
- Social Media Policy
- Acceptable IT use policy
- Equal Opportunities policy
- Information sharing / data protection protocols
- Health and Safety Policy
- Complaints procedure
- Whistle Blowing policy
- Loan Player Policy
- Work Experience policy

- Match Day safeguarding plan
- Flag Bearers policy
- ACT policies
- Academy policies
  - Trips, Travel and Tours policy
  - Accommodation Plan
  - Senior appearances
  - Academy photo protocols
  - Academy social media and contact protocols

This is not an inclusive list.

## **Safeguarding Legislation and Guidance**

Safeguarding at PAFC is influenced by a range of legislation and guidance:

- The Care Act 2014
- The Mental Capacity Act 2005
- The Equality Act 2010
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006 (amended 2012 to DBS)
- Counter Terrorism and Security Act (Prevent) 2015
- DBS Barring Referral Guidance
- NICE Guidelines on Child Abuse and Neglect
- Information Sharing (advice for safeguarding practitioners) July 2018
- General Data Protection Regulations (GDPR) 2018
- Human Rights Act 1998
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work regulations 1999
- The Sheldon Report recommendations 2021
- Modern Slavery Act 2015
- Female Genital Mutilation Act (FGM) 2003
- Anti-social Behaviour, Crime and Policing Act (Forced Marriage) 2014
- Domestic Abuse Act 2021
- Police Operation Encompass (DA) information sharing protocols
- UKCCIS guidance 2021 (sharing nude and semi-nude guidance)
- Ann Craft Trust guidance
- The FA Safeguarding Policies and Guidance
- The EFL Safeguarding Standards 2021/22
- The EFL Managing Concerns guidance
- The EFL Eligibility Guide (DBS criteria) 2021

This is not an exhaustive list and when new law and guidance is released PAFC will follow the updated information.

The Care Act 2014 has widened the scope of safeguarding and the responsibilities to promote the well-being of adults at risk. Safeguarding is the responsibility of everyone and PAFC support this ethos. The Care Act 2014 is used in conjunction with a number of other legislation and guidance to provide a safe environment.

## Policy Statement

PAFC takes its responsibilities very seriously regarding providing a safe and positive environment where children, young people and adults at risk who are present at any of its PAFC led activities and (under the supervision) of one or more members of our staff.

All vulnerable people, regardless of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion and/or sexual orientation (defined as Protected Characteristics within the Equality Act 2010) have the right to equal protection from all types of harm or abuse

All participants and visitors to PAFC activities have the right to feel safe and to be safe. Wherever they come into contact with us they will be treated both lawfully and fairly and with both dignity and respect. All the members of our staff have a duty to keep all vulnerable people safe and to help protect them from abuse or harm. All managers ensure that their staff understand and apply that duty.

Good safeguarding practice takes many forms. It is a thread that weaves throughout all PAFC activities that involve children and other vulnerable people.

'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 the experience of abuse or neglect, while at the same time making sure the adult's wellbeing is promoted' (Care Act 2014).

Abuse of adults links to the circumstances rather than the characteristics of the people experiencing harm. The term 'Vulnerable Adult' is seen as disempowering, the Care Act describes potentially 'At Risk' from harm or abuse.

The Ann Craft Trust is a leading safeguarding organisation funded by Sport England and supported by the EFL. The principles are shared with the ethos of PAFC and the key principles have been used within this document.

The purpose of this policy is to ensure that all staff are aware of the needs of 'adults at risk'. That appropriate training and guidance is in place in order to recognise abuse and provide guidance on how to report concerns or allegations.

## Principles of safeguarding

The term safeguarding is a shortening of the phrase "safeguarding and promoting the welfare". We follow the 6 principles of safeguarding:

1. **Empowerment:** it is important for an adult at risk to be supported and encouraged to make their own decisions and give informed consent
2. **Prevention:** it is better to take action before harm occurs
3. **Proportionality:** the least intrusive response appropriate to the risk presented
4. **Protection:** support and representation for those in greatest need
5. **Partnership:** local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse
6. **Accountability:** accountability and transparency in safeguarding practice

## **PAFC Safeguarding Framework**

This policy is to be used in conjunction with our other safeguarding policies and protocols. PAFC safeguarding seeks to implement a clear and effective programme of work that is embedded across all staff.

Our safeguarding vision:

### **PAFC will:**

- Respect and promote the rights, wishes and feelings of all vulnerable people.
- Recruit, train and supervise staff to adopt best practice in order to safeguard and protect from abuse and themselves from false allegations.
- Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.
- Share information with relevant agencies and organisations in a timely manner (as far as the law permits).

### **Our safeguarding aims:**

- A safe and welcoming environment for all people involved in any PAFC led activities, wherever they are in the world, free from abuse and fear of abuse in all its forms
- A culture where safeguarding practice is widely understood, openly discussed and where staff recognise the role they play in keeping all vulnerable people, themselves and their colleagues, safe from harm
- A clear system which promotes and supports; constant vigilance, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incident
- To apply legislation, government policy & guidance, and football governing body regulations, policy and guidance where applicable; and
- To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of all vulnerable people.

### **To realise these aims we will:**

- Work or liaise with relevant football governing bodies, statutory agencies and other social care welfare bodies to ensure we meet all necessary regulations and standards in respect of our safeguarding practice
- Listen to adults at risk and take them seriously, consult with them when developing processes and react appropriately to ideas, feelings and concerns, then address them in a fair, effective and timely manner
- Develop and communicate a series of clear policies, protocols and guidance designed to help deliver sound governance and good practice across PAFC's activities, including regular safeguarding meetings with representatives from all relevant areas of PAFC.
- Maintain a visible safeguarding presence across all areas of PAFC including for remote communications and on social media platforms
- Monitor activities taking place at PAFC facilities and those at off-site locations



- Provide training, advice and support across all areas of the PAFC where children and other vulnerable people are involved in any PAFC led activity
- Support and help deliver the PAFC's 'safer recruitment' philosophy in accordance with local legislative and regulatory requirements and in partnership with the human resources department and relevant managers
- Maintain confidentiality of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with relevant data protection legislation
- Share sensitive information with the relevant authorities when it is appropriate to do so and in the knowledge that the information will be treated confidentially.
- Prepare annual safeguarding reviews covering each strategic element of PAFC.

## **Roles and Responsibilities**

Andrew Parkinson – CEO and Senior Safeguarding Manager

Darren Green – Designated Safeguarding Officer (DSO) and Prevent Lead

Nikki Francis – Disability Liaison Officer

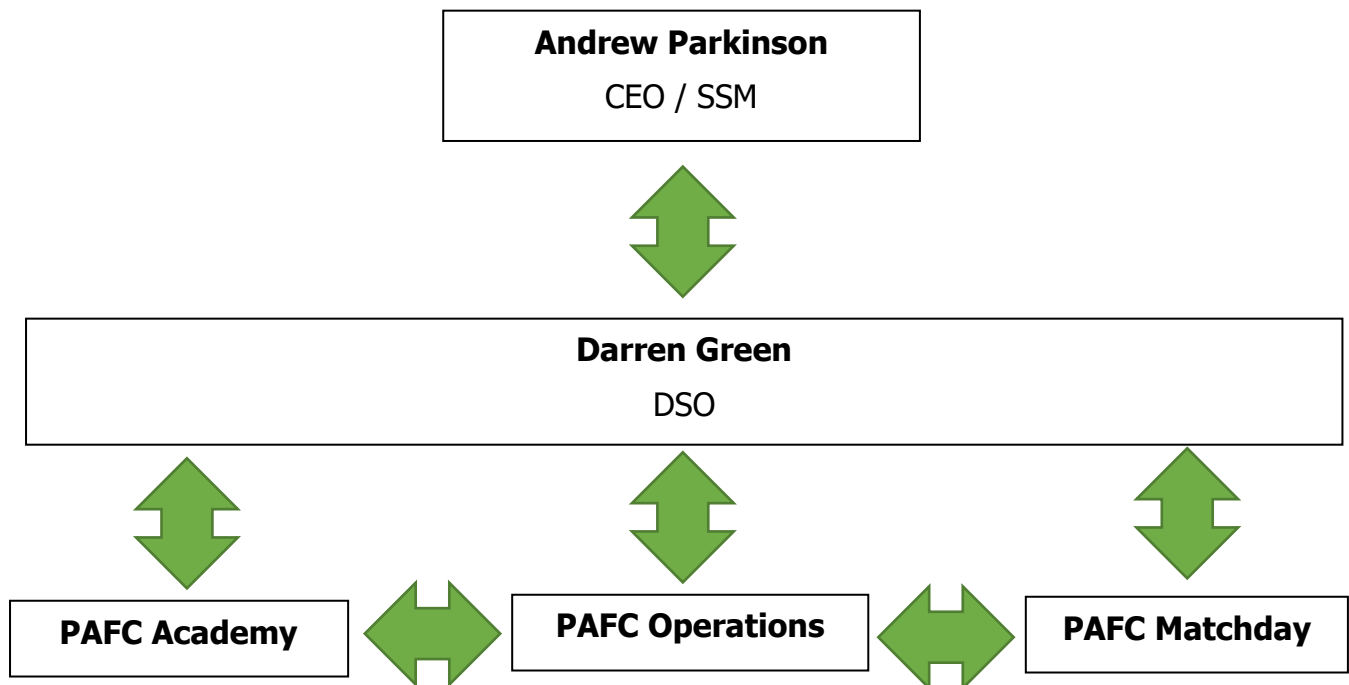
## Organisational Safeguarding Flowchart

Safeguarding adults at risk across PAFC is given a very high priority. PAFC have a full time DSO to promote the best practice and create a safer culture across all aspects of the club.

At PAFC operational board level, Andrew Parkinson is the SSM and endorses this policy and all other safeguarding policies on behalf of the board. Safeguarding is a standing agenda item at board meetings and the DSO reports regularly.

PAFC have safeguarding representatives across all aspects of business to ensure the highest standards are maintained consistently.

PAFC have additional safeguarding policies and protocols, which give greater detail and support this central document, which is to be used as a reference material.



The ACT have their own DSO and safeguarding management structure. The DSOs regularly meet in order to share information and promote best practice across both organisations.

PAFC have a Disabled Liaison Officer (DLO) who is the first contact point for those who need additional considerations when attending matchday or other PAFC events.

## Raising a Concern

Due to their contact with adults at risk, PAFC staff are well placed to observe the changes in an adult's behaviour and outward signs of abuse. Adults at risk may turn to a trusted person when they are in distress or at risk. It is vital that all staff are alert to this and understand the procedures for reporting their concerns and what appropriate action to take.

Safeguarding concerns fall into one of the following types:

- The behaviour of one person towards another
- A risk identified through the recruitment process (DBS)
- Information about an individual provided by statutory agencies or another route
- Allegations of abuse
- Concern about harm to a person that has taken place outside of any PAFC activity, but identified while at a PAFC activity

For members of staff these concerns can apply to both their professional and private lives and poor conduct in either may affect their position in the workplace.

PAFC ensure that confidentiality of safeguarding cases is maintained. Everyone is told to report safeguarding concerns, however small.

The secure safeguarding reporting and case management system 'My Concern' is used by PAFC for reporting all safeguarding concerns. Only the DSO and essential people involved will be aware, on a need-to-know basis.

Statutory information sharing protocols will be followed where necessary including the FA safeguarding case management, the EFL safeguarding team, the local authority and the police.

A victim centred approach to safeguarding is at the centre of the PAFC ethos. Wherever possible the vulnerable person will be involved in every aspect of managing the concern.

If a person is at immediate risk of harm or about to become the victim of a crime, the police must be informed via 999. Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral.

Any person at risk of abuse may turn to a trusted person at PAFC when they are in distress or at risk. It is vital that our staff are alert to the signs of abuse and what steps to take if any person confides in them.

**Mandatory reporting** – If any member of PAFC staff has a concern about an adult at risk, they have a duty to refer this to the DSO. The DSO will ensure every instance is recorded on 'My Concern'. This will ensure transparency, an audit trail, identify poor practice, lessons learned and themes.

If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

Where a very serious concern is raised that involves anyone involved in a PAFC activity, the SSM, who is the board representative, will be informed.

## Reporting

There may be occasions when staff are concerned about a person's welfare and may suspect that a person may be at risk of harm. Staff should give that person the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a pet has died, a relative is very ill or an accident has occurred.

Following an initial conversation, if the member of staff remains concerned, they should discuss their concerns with their line manager, Designated Safeguarding Officer. A 'My Concern' report must be recorded.

If the person does begin to reveal that they are being harmed, staff should follow the advice below. Concerns which do not meet the threshold for intervention will be monitored.

**Taking action** – Any person could become a victim of abuse. It is important to believe that person and take the matter seriously.

Key points for staff to remember:

- Discuss your concern with your line manager and report it your Dedicated Safeguarding Officer – follow the procedure for your activity.
- In an emergency take the action necessary to help the person, if necessary call 999 or 101 for local police.
- Consider the welfare of the victim (and the reporting person if different).
- Remove the alleged perpetrator from the workplace.
- Do not start your own investigation.
- Secure evidence, especially if the allegation involves a sexual assault (clothing and hygiene items).
- Share information on a need-to-know basis only – do not discuss with colleagues, friends or family.
- Make a record and use the Note and Record advice (annex attached) to guide you. Make an entry on 'My Concern' or confirm one has been made.
- Seek support for yourself if you are distressed.

If the adult at risk is in need of immediate medical attention:

- Call for an ambulance.
- Inform carers / nominated person / NOK you are doing this. If they are allegedly involved in the abuse, only inform them that you are taking that person to hospital. Do not share any other information.
- Inform doctor of your concerns in relation to adult abuse issues.
- The doctor will take appropriate action.
- Inform your manager and report your concerns.

### **If an adult at risk discloses to you:**

If any person discloses about any risks to their safety or well-being, the staff member will need to tell that person the information will be recorded – staff are not allowed to keep secrets.

### **How to respond:**

In the event that an adult at risk makes an allegation or disclosure of abuse, you can use the TED questions to gain clarity: 1. Tell me what happened, 2. Explain, 3. Describe.

- **Listen** and/or closely observe their presentation and behaviour
- **Do not** interview, investigate or ask leading questions
- **Let them know** that you will need to tell someone else in order to help them
- **Do not** promise to keep what they tell you secret
- **Do not** speak with the alleged person or carers / responsible person / NOK of the victim
- Respond appropriately: make notes and discuss with your line manager
- Report your concerns and contact the DSO
- Record your observations; complete a My Concern entry. This will automatically be submitted to the DSO. Keep any notes as they are vital evidence and may be required for any criminal investigation

If any person starts to disclose something and then stops when they are informed you must record it, or that it cannot remain confidential, this must still be reported on 'My Concern'.

**Notifying carers / responsible person / NOK** – PAFC will normally seek to discuss any concerns about an adult at risk with their carer / responsible person / NOK. This must be handled sensitively, and where possible the DSO will make contact with the nominated person in the event of a concern, suspicion or disclosure. However, if PAFC believes that notifying the nominated person could increase the risk to the adult at risk, advice will be sought from the DSO in partnership with social care.

**Referral to adult social care** – A member of the safeguarding team, or DSO can make a referral to the local authority adult social care if it is believed that a person is suffering or is at risk of suffering significant harm.

The adult at risk (subject to their age and understanding) and carer / responsible person / NOK will be told a referral is being made, unless doing so would increase the risk to the person.

A direct referral can be made by any member of staff, if they genuinely believe independent action is necessary to protect the person. The DSO must be informed of your actions as soon as practicable afterwards.

**Reporting directly to adult social care** – Staff should follow the procedures outlined in this policy. However, when there is concern about the immediate safety of any person at risk, you may share information directly with social care, or the Police if:

- The situation is an emergency or out of hours
- The DSO or a supervisor are unavailable
- A direct report is the best way to ensure the person's safety at that time
- For any other reason they make a judgement that the direct referral is in the best interest of the person. The DSO must be informed as soon as practicable and a My Concern entry made.

**Reports against staff** - If a report is made against PAFC staff or volunteer, the report will be taken seriously where relevant law, football protocols and policy will be adhered to and where appropriate information sharing between agencies will take

place. This will be recorded on the secure My Concern system and managed by the DSO. HR disciplinary procedure will be complied with. It is likely the staff member will be removed from the activity or suspended as a matter of course to assist an unhindered enquiry into the events.

## Low Level Concerns

PAFC complaints procedure will be followed where a member of staff, or adult at risk, or carer / nominated person / NOK raises a concern about poor practice towards a vulnerable person that does not reach the threshold for reporting to social care / LADO.

Poor practice examples include unfairly singling out a vulnerable person, or attempting to humiliate that person, bullying or belittling an adult at risk, or discriminating against them in some way. Poor Practice is defined in the section 'What is abuse'. A low-level concern may be a minor concern such as a nagging doubt.

Low level concerns must be managed before they spiral out of control. Information sharing principles will be followed to establish any patterns or ongoing risk.

The EFL have specific guidance to ensure a co-ordinated approach to low level concerns.

The FA safeguarding unit have a database covering all football concerns. Where an individual reaches 3 low level concern reports, or they leave employ of PAFC having received a low level concern report, this information will be shared with the FA. This is not withstanding any other appropriate action that may be taken to address the low level concern reports by PAFC.

All staff members should feel confident to raise any concerns of poor or unsafe practices.

**Action to be taken** - Make a My Concern report / inform the DSO when there has been a nagging doubt or poor practice has been identified. The DSO will then lead the enquiries as per any other concern that has been raised.

Other options can be considered by the reporting person: The Ann Craft website for advice, or consider speaking with your manager, or make a report / complaint / grievance to HR.

If a member of staff feels this route has been ineffective, PAFC have a Whistleblowing policy, which can be used independently of the safeguarding team.

If the allegation is regarding the safeguarding team, the HR manager should be informed and the matter dealt with independently. There is nothing to prevent anyone from reporting a concern direct to external agencies such as the social care or the police if the reporting person is doing so in the best interest of the adult at risk.

As with all disclosures and reports, the process for managing low level concerns may result in a discipline / misconduct investigation, or an adult safeguarding investigation, or a criminal investigation. All notes or information must be securely retained as they may be required for any such investigation.

## Confidentiality

Information can be shared lawfully where there are concerns about the safety of an individual, and where it is in the best interests of that individual. Information sharing between organisations can improve the decision-making process, assists in early intervention, prevention and in improving outcomes for the individual.

Staff must only share safeguarding information in line with ECHR, being lawful, necessary and proportionate. All staff must be held accountable for their actions when passing personal information and must comply with the framework of this policy. All matters relating to child protection and safeguarding are confidential and information is disclosed on a need-to-know basis.

**Information sharing** - Data protection legislation permits data information sharing: 'If a professional has concerns about a vulnerable person's welfare and believes they are suffering or likely to suffer significant harm they should share the information with children's social car'. This is reflected in 'Working Together to Safeguard Children' 2018. The same protocols are followed with any safeguarding concern.

Information sharing is guided by the following principles: the information is necessary, proportionate, relevant, adequate, accurate, timely and secure.

Information sharing decisions will be recorded, whether or not the decision was made to share.

**Information management** – Safeguarding information is stored and handled securely in line with the Data Protection Act 2018 and GDPR. Information will be stored separately from other records on My Concern, which is a secure place with limited access to designated people. My Concern is the secure safeguarding case management system and is approved by the EFL.

Physical or written information will be secured in a locked facility.

The DSO will normally obtain consent from the adult at risk and, carers / nominated person / NOK to share sensitive information within PAFC or to agencies. When there is good reason to do so, the DSO may share information without consent, and will record that reason.

Safeguarding records may be exempt from the provision of the Data Protection Act, which means there may not be an automatic right for adults at risk / carers / nominated person / NOK to see them. If a request is made to any member of staff the DSO must be informed.

The Data Protection Act and PAFC's data protection policies do not prevent staff from sharing information with relevant agencies, where that information may help to protect a person at risk from harm.

PAFC have a risk register, for which safeguarding is included, this will reduce or negate risk and enable an ongoing evaluation process.

**Files** – Concerns are recorded securely on My Concern, which is overseen by the DSO. The case management process records how concerns have been received, responded to, and dealt with.

**Whistleblowing** – PAFC views the reporting of concerns by members of staff as a vital element of maintaining the core values. Individuals are strongly recommended to report incidents of malpractice, where policy, protocol or law may have been breached by another member of staff. Failure to report such a matter may result in disciplinary or criminal action. PAFC have a whistleblowing policy published on their website.

**Referral management** – All concerns raised will be dealt with in a swift and confidential manner. When the concern could be of a serious nature a referral to the police, or LADO, or social care should be made at the earliest opportunity.

Where a concern is raised through My Concern, or directly with the DSO, the matter will be dealt with as a matter of urgency, usually within one working day.

**Record keeping and confidentiality** – All incidents and concerns will be taken seriously, accurately recorded, acted on as appropriate, and confidentially retained. Records will be reviewed to identify patterns of behaviour that may raise a concern. All information collected and stored, will be treated with sensitivity and handled in accordance to data protection legislation. There may be a requirement to refer matters to the governing body or social care.

## **Consent**

PAFC recognise the importance of approaching the individual needs of the adult at risk in the appropriate way and according to law and statutory guidance.

Where a person is at risk of harm, consent to act on concerns is not normally required in law, although PAFC recognise that consent and consultation with those with carer / nominated person / NOK responsibility is considered best practice, unless this would put that person at greater risk of harm.

Consideration of mental capacity is crucial all stages of safeguarding adults at risk. Determining the vulnerabilities and the choices made, given regard to the situation and the risk they leave themselves open to. All adults are deemed to have capacity unless there has been a formal assessment under the Mental Capacity Act.

If the person is deemed not to have capacity, then staff should act in the best interests of the individual to do what is necessary to promote their health and well-being or prevent deterioration.

If a person is deemed to have capacity and their informed choice puts them at risk, then that person (and carer / nominated person / NOK) should be consulted with to ensure the individual is offered all possible options. Should the individual still wish to be in a position of risk, consideration needs to be given to ascertain if they are doing so of their own free will, or being coerced or intimidated.

**Advocacy** – Independent Mental Capacity Advocates (IMCAs) should be considered to represent the individual when there is no independent person able to represent them. They assist where there is a potential issue of capacity. In Plymouth, The Highbury Trust operate IMCAs.

The key to delivering effective safeguarding practice is coordinated information sharing with an individual centred approach.



## Partnerships

PAFC works closely with statutory agencies, football regulators and appropriate organisations and follow the safeguarding information sharing principles.

PAFC work in partnership with Plymouth Safeguarding Adults Partnership and other relevant multi-agency partnerships, including the Plymouth Prevent Partnership. PAFC abide by safeguarding information sharing protocols with statutory agencies, including the police.

PAFC work closely with the FA and EFL safeguarding teams to ensure compliance with a football wide governance.

There are regular meetings between the safeguarding teams of PAFC and the ACT, to confirm strong team working and collaboration.

Adults at risk are often known to a number of services and it is important that information is shared. This will increase awareness and ensure a co-ordinated response, promote early intervention and prevention of more serious concerns.

When a referral has been made, or The FA/EFL informed, or other partner agencies have been informed, the DSO will remain PAFC point of contact and work in partnership in line with relevant protocols and information sharing agreements. The DSO will remain in contact with HR and the board as appropriate depending on circumstances.

When there is a decision not to refer there are numerous considerations to be made. These include; capacity, undue influence, coercion or intimidation. A record must be made of the decision-making process and communication with the individuals involved.

When the adult at risk does not wish a referral, an investigation under safeguarding provision will only take place if; others are at risk from the same person, service or setting and the seriousness of the situation requires immediate action which is lawful, proportionate and necessary under ECHR.

When speaking with adults at risk, consideration should be given to how easily the individual is influenced, whether they fully understand what has been said and may not normally have people listen to their views.

A victim centred approach to safeguarding is at the centre of the PAFC ethos. Wherever possible the individual will be involved in every aspect of managing the concern.

## Support

Any abuse is devastating for the individual and can result in distress and anxiety for staff who become involved.

We will support victims, their families and staff by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact.

- Where a member of staff is the subject of an allegation made by an adult at risk, separate link people will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from victims or staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of helplines or other avenues of external support.
- Following the procedures laid down in our safeguarding policies, whistleblowing, complaints and disciplinary procedures.
- Co-operating with relevant statutory agencies.

## **DSO Procedures**

PAFC is not an expert in adult safeguarding and refers issues to the appropriate agencies and governing bodies. All information received will be dealt with confidentially and shared on a need-to-know basis.

PAFC operate in an open and transparent manner. Any concerns relating to a member of staff or volunteer, should be recorded via the 'My Concern' App and the DSO informed. PAFC record all allegations and follow Low Level Concerns principles.

Where necessary PAFC will work in partnership with the Local Authority Designated Officer (LADO), the FA Safeguarding Case Management Team and EFL Safeguarding Team. PAFC have a whistleblowing policy.

When an allegation against a member of staff is made, this procedure must be followed. It is rare for an adult at risk to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do occur.

When notified of an allegation of abuse by a staff member, the DSO will:

- Ensure the adult at risk is removed from any immediate risk of harm
- Consider the welfare of all parties involved
- Confirm the report is recorded on My Concern
- Review the information and confirm any evidence is secured
- Complete a risk assessment as necessary
- Obtain a written factual statement from the person making the report
- Any account or statement made by an adult at risk, will be written in their words.
- Any reports must contain only facts, not conjecture or opinions
- All written records are to be securely retained
- If the report involves an allegation regarding a member of staff, and where the threshold is met, it will be reported to the LADO within one working day
- The DSO will manage any referrals in accordance with legislation and information sharing protocols

Where appropriate we will co-operate with the lead investigator. Care will be taken to monitor the seriousness of the report as new information comes to light. If information comes to light to suggest it is a false allegation, we will enquire what made a person make such a report, and if there are other sources of risk to them.

If the concern occurred outside of PAFC, the DSO will inform the Plymouth Adults Safeguarding Partnership, or other local authority where the person lives.

The carers / nominated person / NOK of the person will be informed as soon as possible following advice from social care or the police.

If the allegation relates to a member of PAFC staff, the DSO and or the SSM will:

- Liaise with the Head of Media in order to liaise with the FA media team and agree a holding statement if required.
- Inform the football governing bodies; [safeguarding@thefa.com](mailto:safeguarding@thefa.com) and [safeguarding@efl.com](mailto:safeguarding@efl.com)
- If the SSM is not available an appropriate board member must be informed
- Inform the HR Manager and the appropriate head of department and create a plan of action

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently. They have the right to be informed of its progress. Suspension is a neutral act and may assist the unhindered investigation of the concerns. However, this is not the default option and alternatives to suspension will be considered. In some cases, a suspension will be the best way to protect the interests of both the adult at risk and the staff member. If a member of staff is suspended, they will receive support and a named point of contact.

**Non-Recent Allegations** - Allegations concerning staff who no longer work at PAFC, or non-recent allegations (some refer to this as historic cases), will be reported to the LADO, the police, the FA Safeguarding Unit and the EFL Safeguarding Team, even if the alleged perpetrator of the abuse is believed to be deceased.

## Good Practice

PAFC accept the moral and legal responsibility to comply with the duty of care to protect and safeguard the young and adults at risk. PAFC promote an organisational culture to ensure all adults at risk are respected as individuals and can raise their concerns with confidence.

To meet and maintain our responsibilities towards adults at risk, we need to agree standards of good practice which form a code of conduct for all staff.

Good practice and staff conduct includes:

- Provide a safe environment for adults at risk
- Treating all people with respect and in accordance with their needs
- Setting a good example by conducting ourselves appropriately
- Involving adults at risk in decisions that affect them
- Encouraging positive, respectful and safe behaviour among everyone
- Being a good listener
- Staff are encouraged to act responsibly and help adults at risk keep themselves safe
- Staff who may come into contact with vulnerable people need to be conversant with the other PAFC safeguarding policies
- Be alert to changes in behaviour and signs of abuse, neglect or exploitation

- Recognising that challenging behaviour may be an indicator of abuse
- Asking a person's permission before initiating physical contact, such as physical support during a sporting activity or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between adults at risk and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some people lead to an increased risk of abuse.
- Working in an open environment and within sight or hearing of others.
- Reporting concerns about a person's safety and welfare.
- Adult relationships where there is or has been a power imbalance in the workplace must be avoided to reduce vulnerabilities
- Following PAFC policy with regard to personal relationships with participants, including virtual communication, including on social media
- While in a position of trust, inappropriate behaviour towards adults at risk is unacceptable and likely to be unlawful (Abuse of Position of Trust)
- Challenge unacceptable behaviour and report poor practice

**Activities** – Safe working practices are based on PAFC safeguarding policies and protocols, which safeguard adults at risk from harm and potential abuse as well as protecting staff by providing a framework to work within, reducing allegations which can arise from vulnerable or compromising situations.

- Securing consent in writing for all activities (including photography and first aid)
- Following staff codes of conduct
- Accurate record keeping (including accidents, treatment, personal notes, complaints, compromising situations)
- Risk assessments completed prior to activities (including events and trips)
- Adequate supervision levels to prevent misbehaviour and or peer abuse
- Promoting and respecting the rights of others
- Promoting a person-centred perspective and equality

Inclusive good practice – PAFC encourages inclusivity and provides opportunities for all people regardless of any additional needs or vulnerabilities, promoting equality and diversity.

## **Safeguarding Staff**

Safeguarding is also about ensuring that all staff, volunteers and partners understand the role that they play in protecting vulnerable people. Across PAFC there will be a wide range of employment and deployment arrangements involving full-time or part-time permanent staff, consultants, matchday staff or volunteers.

Our staff is what makes this policy 'live'. This means all members of staff who are involved in training, managing, supervising or caring for children or adults at risk must work conscientiously to help keep those in their care safe from harm. They must also be aware of how to keep themselves and their colleagues safe from having allegations made against them by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others. In turn this has a direct impact on maintaining the reputation of PAFC.

**Staff handbook** – PAFC have a staff handbook which outlines safer working practices and applies to all staff.

**Safer Recruitment** – Those who apply for a role that involves working with children, young people, or adults at risk are subject to the safer recruitment principles. PAFC have a safer recruitment policy. The EFL provide an eligibility guide to assess who requires a DBS certificate and what level check is required. There will be follow up checks on references and qualifications, in addition to safeguarding questions in an interview. There may be open-source online checks made.

**Safeguarding induction** – Each member of staff will receive an induction by the DSO to ensure they are aware of PAFC policies, expectations, behaviours at work and away from work, including their online presence.

**Safeguarding training** – Each member of staff will complete the EFL online safeguarding training. There is a pass rate of 80%. The training will be retaken in line with the appropriate schedule.

**My Concern** – All appropriate staff and supervisors will be invited to register with My Concern, the EFL approved online safeguarding management system, which will allow easy reporting of concerns.

**DBS** – As per the safer recruitment, all staff engaged in regulated activity, or fit the criteria for the EFL Eligibility Guide must have a valid PAFC DBS and/or allow permission for regular update service checks.

**CPD** – Staff are responsible for their own continued professional development, which includes certificate renewals, first aid, and updating their DBS with any change of circumstance.

**Code of conduct** – Academy staff will be required to annually sign the code of conduct and a self-declaration to register any change of circumstance.

**Staff / adult at risk relationships** – PAFC provides advice to staff regarding their personal online activity and has strict rules regarding contact with any vulnerable person, whether in person or electronically. Any breach of these rules may result in disciplinary action or safeguarding investigation. We will work in partnership with statutory agencies and sport governing bodies.

Staff should ensure they maintain a professional relationship with all children, young people and adults at risk.

Staff must not engage with any sexual relationship with any person while an unequal power relationship occurs.

When a young person has reached the age of 18, PAFC disapproves of any relationships between staff and a young person for whom they have previously been responsible for.

**Abuse of position of trust** – All staff are aware that any inappropriate behaviour towards any person is unacceptable and likely to be unlawful. All conduct towards children, young people and adults at risk must remain professional.

Staff must report any concerns they have about another staff member. If they fail to do so they may be liable to disciplinary action or a criminal investigation. A report must be made by My Concern, or alternatively contact the DSO directly.

**Codes of Conduct** – All academy staff, parents and players are required to annually sign a code of conduct. This encourages a safe environment for our children, young people, and adults at risk, where everyone behaves in a responsible manner.

PAFC participates in national and local campaigns highlighting and promoting the ethos of our players to be respected and speak out if they have any worries or concerns.

**Whistleblowing** – PAFC views the reporting of concerns by members of staff as a vital element of maintaining the core values. Individuals are strongly recommended to report incidents of malpractice, where policy, protocol or law may have been breached by another member of staff. Failure to report such a matter may result in disciplinary or criminal action. PAFC have a whistleblowing policy published on their website.

**ICT** – PAFC use IT in many ways, its use will continue to grow and change with new technology. PAFC use IT to communicate with supporters, customers, players, the media and parents of our young players. PAFC will:

- develop and maintain clear policies on suitable and appropriate use of internet, email, SMS, messaging groups, apps and social media
- Ensure that child related information for players will only be sent electronically to parents. This includes where adults may be at risk.
- raise awareness amongst all vulnerable people regarding safer internet and social media use in respect of their position
- raise awareness, through training and internal communications, with the staff regarding appropriate use of such media and the importance of both professional and personal online activity
- Have a zero-tolerance approach to online exploitation or peer abuse
- Respond quickly and appropriately to inappropriate use of the internet and social media by players, participants and members of staff.

## **Staff Training**

It is important that staff receive training and awareness to enable them to recognise the possible signs of abuse, neglect, and exploitation and what to do if they have a safeguarding concern.

New staff undergo a safeguarding induction as part of PAFC safer recruitment, which includes an introduction on how safeguarding weaves through everyday activity in line with the PAFC vision and behaviour expectations, familiarisation with the PAFC safeguarding policies, safe working practices, reporting concerns and the details of the DSO. Any gaps will be identified and any training needs addressed.

In appropriate roles there is mandatory FA safeguarding training, which is required to be regularly taken.

The EFL provides safeguarding training for all staff, which is taken following induction and at the recommended intervals.

The Single Central Record will be updated for those in regulated activity or where a DBS is also required.

The DSO and SSM have regular EFL mandatory training they attend as prescribed. This increases their safeguarding knowledge within the football setting.

The DSO is Level 3 Safeguarding trained and this must be refreshed every 2 years. There is also optional local safeguarding training held by the PCSP, for which the DSO is able to attend.

The DSO has regular meetings with the board in which they cascade essential safeguarding information, legislation and training.

The Academy has twice yearly safeguarding training from the DSO. New legislation is cascaded, current issues (locally and nationally) are discussed, and training on key safeguarding elements is completed. Training for other departments is done as required.

## What is Abuse

Abuse is the misuse of the power and control one person has over another. Abuse is not based on whether there was an element of intent, but rather that harm was caused, or the risk of harm on the individual.

An incident may be a single occasion or multiple acts. Abuse can be an inaction or lack of action that causes harm or the risk of harm. Abuse can be; intentional or unintentional, is not necessarily a criminal act and is a violation of their human and civil rights.

Abuse can occur in any context in any place, whether at home or the workplace, in a care setting or in public. Where many people consider somewhere safe, this is not necessarily the case for an adult at risk. PAFC must remain a safe place, where adults at risk are confident to report a concern that happened outside of a PAFC activity.

Adults at risk may be abused by a wide range of people they may come into contact with including; family, friend, professional carer, another adult at risk, or someone who deliberately exploits the vulnerable. Stranger abuse can take various forms and can be carried out by more than one person.

Many people find it difficult to imagine that the vulnerable or older people are victims of abuse. It is often a hidden or ignored problem. Some adults at risk may not realise they are being abused, or be able to say what is happening.

Referrals are increasing as more people become aware of adult safeguarding. The most common are in the home setting and is neglect due to an act of omission.

It is not the responsibility of PAFC staff to decide that abuse is occurring, but it is their responsibility to act on any signs or concerns.

There are 5 categories of abuse, these are based on the 'Working Together' 2018 mandatory guidance published by the UK Government and endorsed by the NSPCC and Ann Craft Trust. Other forms of abuse are linked to these categories.

**Neglect** – The ongoing failure to meet a person's basic needs. This includes omissions, intentional or otherwise. A person may be left hungry, dirty, without proper clothing, shelter or supervision. This may form a wider neglect of: physical - where basic needs such as food, clothing or shelter are not met, or they have not been kept safe; emotional – an adult at risk is not given stimulation, this could be through

ignoring, humiliating, intimidating or isolating them; medical – a person is not given the correct healthcare, or withholding a service

**Self-neglect** – not taking care for one's own personal needs, such as; hygiene, health, food and includes behaviours including hoarding. This may be intentional or an inability

**Physical abuse** – When someone hurts or harms a person on purpose. This includes; hitting, slapping, kicking, shaking. Throwing, poisoning, burning or scalding, biting, scratching, breaking bones or drowning. This list is not exclusive, and includes any way of causing intentionally causing physical harm and includes making up symptoms or causing a person to become unwell.

**Sexual abuse** – When a person is sexually abused, they are forced or tricked into sexual activity. They may not understand that what is happening is abuse or that it's wrong. They may be afraid to tell someone. Sexual abuse can happen anywhere, and it can be in person or online. There are 2 types of sexual abuse; contact – where an abuser makes physical contact, whether touching (clothed or not), using a body part or object to rape or penetrate, forcing a person to take part in sexual activities, or making a person touch someone else. Non-contact – this can be in person or online and includes, flashing, showing pornographic material, exposing a vulnerable person to sexual acts, making them perform a sexual act to themselves, forcing a person to make, view or share sexual abuse images or videos, or forcing a person to take part in sexual activities or conversations online or through a smartphone. Consent is an important factor, many adults at risk may not be able to give true consent or understand what consent means.

**Emotional abuse** – Any type of abuse that involves the continual emotional mistreatment of a person. This can include deliberately trying to scare, humiliate, isolate or ignore a person. Further emotional abuse can include; constant criticism, threatening, shouting, calling names, making the person subject of jokes or sarcasm to hurt them, blaming or scapegoating, making a person perform degrading acts, trying to control their life, not allowing friends, persistently ignoring them, being absent, manipulating someone, never saying kind things or praise, or never showing emotions in interactions with them (emotional neglect).

**Bullying** - Behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It also includes nonverbal abuse, emotional abuse, exclusion, constant criticism, hiding or damaging belongings, controlling or manipulating someone, making silent or abusive calls. If the type of bullying discriminates due to a person's race, sexuality or because they have a disability it can be a hate crime.

If a person is perceived to be 'different' from others, they could be at greater risk. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

**Cyber bullying** - takes place online, and be done remotely via phone, Apps, social media as well as online. This can include; sending threatening or abusive texts, creating and



sharing embarrassing images or videos, trolling, exclusion from online games or friendship groups, online shaming, setting up hate sites, encouraging hate crime, taking part in an abusive poll, creating fake accounts, creating or sending sexual images, (also known as nude and semi-nude photos).

## **Additional Safeguarding Considerations**

**Mental Capacity** – refers to whether an individual is able to have the capacity to make a decision or not. A person may have been assessed as not being able to and another has to make those decisions for them. This makes a person vulnerable to abuse.

**Deprivation of Liberty Safeguards (DoLS)** – must be in place when a person having been assessed as not having mental capacity is being deprived of their liberty, in a place such as a care home.

**Domestic Abuse** – DA is any incident or pattern of incidents of; controlling, coercive behaviour, threatening behaviour, violence, psychological abuse, physical abuse, sexual abuse, financial control, emotional abuse, or 'honour' based violence.

**Peer on Peer Abuse** – There are occasions when adults at risk will abuse other vulnerable people. These are sometimes difficult to detect and investigate. While sensitivity is required, they are no less upsetting for the victim. Both parties will need to be protected.

**Abuse of Trust** – This is where one person has a position of power over another due to their work position

**Abuse by Relative, Friend or Carer** – There is a difference between unintentional and deliberate acts or omissions, however the harm or risk of harm caused must be considered to decide whether an intervention is required

**Abuse by Children** – if harm or risk of harm is caused by an under-18, the Adult at Risk policy needs to be followed, however the child's welfare must be considered and referred as required.

**Women and Girls** – Are disproportionately victims of crime and abuse

**Hate Crime** – A hate crime is anything which is targeted at an individual because of hostility or prejudice towards their; disability, race, religion, sexual orientation or transgender identity or any other perceived difference

**Online Abuse** – this any type of abuse that occurs on the internet, mobile phones, social media, emails, online chats, gaming and live stream sites. Strangers purport to be another person (usually in an effort to trick the vulnerable person for their gain). Online abuse is harder to detect. Emotional and psychological abuse are involved, often including financial or sexual abuse. This can occur through public sites or direct messaging and can include; unwanted messages, inappropriate messages, stalking or harassment, intimidation or bullying, financial requests, or sexual coercion / abuse.

**Financial Abuse** – The unauthorised theft, fraud, misappropriation or exploitation of money, possessions, material goods, assets or benefits. Vulnerable people are more at risk when other people assist them with their finances.

**Grooming** – Where someone builds a relationship, trust and an emotional connection with a person so they can manipulate, exploit and abuse them. Any person at any age can groom another and this can be over a very short time, or indeed over a period of years. Grooming activity may include; offering advice or understanding, buying gift, giving the person attention, using their professional position or reputation, taking the person on trips, or using secrets and intimidation to control them. Once the trust is established, the relationship will be exploited and may include isolating the person from friends and family. The Groomer may also build relationships with family and friends of the victim to make them seem trustworthy, while making it harder for the victim to come forward.

**Organisational** – The result of poor professional practice, lacking in framework, policy or protocols within an organisation, which results in a single or ongoing practice that harms or causes a risk of harm to an individual

**Poor Practice** – A behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported, even where there is a belief the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Poor practice occurs when the needs of the child, young person or adult at risk is not afforded the necessary priority compromising their welfare. PAFC use the 'My Concern' safeguarding case management system and expect all staff to report incidents of poor practice as they fall within the description as outlined in the section 'Low Level Concerns'. Examples of poor practice would include; concerning practices, uncomfortable situations, safety concerns, language used, unnecessary singling out of a vulnerable person, or indeed any 'nagging doubt'.

**Infatuations** – a vulnerable person may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively. Staff must beware that in such circumstances, there is a high risk that words or actions can be misinterpreted and allegations can be easily made. As soon as a situation is identified by the staff member or a colleague the DSO must be informed as the earliest opportunity.

**Criminal Exploitation** – vulnerable people can be manipulated or coerced to become involved with gangs and criminal activities. This is often caused by exploitation and after being pressured or abused, they are then put into dangerous situations.

**County Lines** – A term used to describe organised criminal networks involved in moving drugs from one area of the country to another. They are likely to exploit vulnerable people to move and store money. Coercion, intimidation, violence, sexual violence and weapons will be used to force the person to act for them. The person may believe they are consensual to the exploitation. For adults at risk this could involve the takeover of their accommodation, sometimes referred to as 'cuckooing'.

**Modern Slavery** – This encompasses slavery, trafficking, forced labour and domestic servitude. Individuals are deceived, coerced or forced into inhumane treatment. A vulnerable person could be abused by being forced to do work.

**LGBTQ** – PAFC create an inclusive environment. Supporting the LGBTQ+ community is essential as many have suffered bullying, abuse or have consider self-harm. PAFC will manage all concerns in a confidential and sensitive manner in order to support everyone. PAFC is considered a safe and supportive place and as such a person may disclose sensitive information to a trusted individual. As with all safeguarding disclosures, the DSO must be informed and will manage the information and make a plan moving forward to support the individual.

**Cultural sensitivity** – Our increasingly diverse community means we will have more children, young people and adults at risk with different cultural needs engaging with us. This will require staff to be sensitive to the vulnerabilities and must refrain from stereotypical beliefs. Each person must be treated in accordance with their needs, but care must be taken as not to further isolate the individual when dealing with a concern due to the extra attention. Some people speak English as a second language; therefore, care must be taken to confirm any communication is understood correctly.

**FGM** – Where a female’s genitals are deliberately altered or removed for a non-medical reason. There are no health benefits for girls or women. It can happen at several stages of a female’s life, including at birth, during childhood, as a teenager, before marriage, or during pregnancy. It is illegal in the UK, whether committed here or abroad.

**Forced Marriage** – Where the marriage is not consented by one or both spouses. Duress can include physical, psychological, financial and sexual pressure. A forced marriage must not be mistaken with an arranged marriage, where the marriage is entered freely by both parties, although the families take a leading role in the choice of partner.

**Honour Based Violence** – Crimes or incidents which are, or may have been, committed to protect or defend the reputation or honour of the family and / or the community. They can include; physical assaults, abduction, or even murder.

**Radicalisation and Extremism** - Radicalisation and exposing vulnerable and young people to extreme behaviours is a form of emotional abuse and is a safeguarding risk. PAFC will monitor and manage these in accordance with its established processes in the event a concern is raised.

Radicalisation can take place through direct personal contact, or indirectly either online or through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

PAFC work in partnership with the police and local partnerships and support the government Prevent Strategy, in order to support the most vulnerable in our community who are at risk of radicalisation. PAFC have a Prevent policy which is published on the website.

**Non-Recent Abuse** – When a young person, or an adult comes forward as being abused when they were younger. This may have occurred a year ago or many years

ago and has been referred to as 'historical abuse'. PAFC acknowledge there have been cases occur within football and have adopted the 'Sheldon Report' 2021 recommendations. If a report is made to PAFC, the DSO will record the matter and liaise with the police, PSCP, EFL and The FA, to ensure the matter is investigated in a transparent and thorough matter and the victim is appropriately supported through local and national agencies who are expert in these cases.

## **Mental Health**

Mental health plays a key role in a person's overall wellbeing and can be affected by various factors, including; environment, stress, family circumstances, or abuse and neglect. Negative experiences can adversely affect a person's mental health, just as positive experiences can help improve it.

PAFC take the mental health of everyone very seriously. Any concerns should be raised by My Concern or reporting it directly the DSO. Remember if any person is at immediate risk of harm: Call 999. We will be able to assist the person, by sign posting to relevant agencies, both statutory and voluntary.

The mental health of adults at risk is the responsibility of everyone. We must all promote their wellbeing and recognise any concerns. Staff will be able to recognise any concerns and know what action to take.

PAFC create an open environment where people can talk about how they feel without judgement. While we are not experts in the field of mental health, we utilise the help of professionals and other resources, such as the Ann Craft Trust.

## **Contextual Safeguarding**

Adults at risk are influenced by a range of environments and people outside of their family. For example; in the community, their peer groups, or online. vulnerable people encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that adults at risk may encounter multiple risks. Contextual safeguarding looks at how we can best understand these risks, engage with adults at risk and help keep them safe. PAFC can be a constant and trusted place for our supporters and it may be here they feel able to disclose a risk which occurred outside of PAFC, for which we must act to keep them safe, which may mean involving other statutory agencies and the police. We must also ensure that PAFC remains a safe place and mitigate safeguarding risks wherever possible.

When a safeguarding concern is raised, we must also consider the wider community factors for the vulnerable person and where the threats or risks may occur. We must also consider the welfare of others and if they are at risk. Assessments should consider all their individual needs, including support and their understanding of other potential environmental risks. PAFC work in partnership with social care, other statutory agencies, football governing bodies and voluntary sector in order to protect and promote the wellbeing of victims.

**Consultation** - Where appropriate we will consult with the adult at risk, their carers / nominated person / NOK to understand their needs, concerns and wishes in order that these may help shape PAFC policy, procedure and practice, we listen to our

supporters. We record all concerns that are raised and we have a lesson learned philosophy to continually improve our standards.

## **Standards of Behaviour**

We want to create a safe environment, where all people can enjoy themselves and we ensure their wellbeing is supported. PAFC expect that all people behave in a way that upholds the standards expected.

PAFC does not condone behaviour that falls short of our vision and expectations and that includes all people. We take a positive approach to behaviour management and recognise the following:

- Every person is different and has individual needs
- All people are expected to take responsibility for their actions
- Behaviour can be a reflection on how a person is feeling
- Staff are trained to recognise a change in behaviour, which may indicate an underlying issue
- All responses to challenging, aggressive, or violent behaviour must be considered to protect the welfare of others, and any physical intervention must only be as a last resort. Any responses must be reasonable and proportionate
- Diffusion and de-escalation techniques may be used by our staff, but any physical punishment is not permitted
- All incidents must be recorded on My Concern and the DSO will make follow up enquiries

## **Safer Recruitment**

PAFC have a set of practices and a policy to help make sure that our staff and volunteers who come into contact with adults at risk are suitable to do so. It is vital part of creating a safe and positive environment and making a commitment to keep all people safe from harm.

Our commitment to safeguarding and protecting everyone is demonstrated by:

- Implementing robust safer recruitment practices
- Identifying and rejecting people who are unsuitable to work with children, young people and adults at risk
- Responding to concerns about the suitability of applicants both during the recruitment process and once they have begun their role
- Ensuring all new staff and volunteers participate in a safeguarding induction
- HR and safeguarding policies supporting safer recruitment
- Ensuring all staff complete the EFL safeguarding training
- Ensuring all relevant staff complete The FA safeguarding training

HR have a robust recruitment strategy including guidance on advertising, selection procedures, offers of employment, checks and references. The main Child Protection Policy has more detail and there is a standalone safer recruitment policy.

## **Photography and Image Capture**

PAFC acknowledge that celebrating success is a key part of football and many activities are held in the public arena. We welcome photographs and images that celebrate the sport, the values and the vision of PAFC.

We understand that image capture can present difficulties, risk and sensitivity in a range of circumstances. During the course of our activities, it is foreseeable that a vulnerable person's image may be captured by appointed photographers. These images may then be used by PAFC staff and contractors in both internal and external news and marketing publications and online via websites and social media.

We believe that any person should not be subject of abuse of any kind. We have a responsibility to promote the welfare of all adults at risk and to take, share and use images safely. Parents / carers have the right to decide whether their images are taken and how they may be used.

**Incidental image capture on matchdays and at events** – Large crowds may create further questions with regard to consent. As such on matchdays and at special events there is a reasonable expectation that any person may have their image captured or broadcast, and as such explicit consent is not required. In any situation where children or adults at risk may be subject to incidental image capture, i.e. in the background of a main shot, where practical they should be informed, they may be on camera and have an opportunity to opt out.

Where a person finds their image or that of an adult at risk has been used in these circumstances, we will endeavour to remove it from circulation where it is practical to do so, and there are reasonable grounds. We acknowledged that once published, trying to control an image in the public arena is particularly difficult.

PAFC will not be able to control the photos taken by members of the public which are taken in public spaces, such as on pitch activity on matchdays at Home Park.

**Consent** – Where PAFC conduct an activity that may allow for the image capture of a participant, the appropriate consent must be in place prior to the event. Those individual and carers / nominated persons / NOK must understand what they are consenting to and why. This consent must provide a genuine choice in order to be valid. Activities arranged in the public arena will mean that non authorised PAFC staff, such as passing members of the public, would be able to take photos which would be outside of PAFC control.

**Social media** – PAFC have a published policy on how it uses social media and the importance of engaging with fans. The policy outlines the PAFC vision and values and how it will deal with abusive online activity. Any social media concerns involving any vulnerable person, the DSO will be informed and the matter recorded and managed through My Concern.

The use of smart phones and live broadcasting to the internet, the scope for image sharing has increased dramatically and will continue to do so with advances in technology. Extra vigilance must be taken and applying the policy fairly and firmly.

**Further image capture considerations** – In general, all people should take these considerations into account:

- Staff should not use their own equipment to take photos

- It is not permitted to take photos of any person partially dressed or in changing rooms
- Staff should not take the image of an adult at risk unless the correct permissions are in place beforehand
- People who are more vulnerable, such as being upset, injury, or ill, must not have their photo taken
- Unless permission is in place beforehand, the full name of the vulnerable person must not be in any captions, kit or reports, as this may leave them more vulnerable.
- No images should be taken that are sexually suggestive or provocative
- With advancing technology, it is becoming easier to digitally alter photos, and this must be considered with all photos taken.

Any reports or concerns of inappropriate image capture must be reported on My Concern and the DSO informed as soon as practicable. PAFC will work in partnership with other agencies, including social care, LADO, police, football regulators, and voluntary support agencies to keep our children, young people and adults at risk safe and investigate any accusations.

**Image storage** – All images, whilst held by PAFC, will be securely stored on PAFC's IT system, complying with the Data Protection act 2018, and remains the property of PAFC at all times. Should any person have a legitimate issue arising out of PAFC images, they may contact the data protection officer, [dataprotection@pafc.co.uk](mailto:dataprotection@pafc.co.uk) Details can be found in PAFC's privacy notices available on the PAFC website.

## Appendix A - Useful Contacts

If a young or vulnerable person is at risk of immediate harm: 999

NAME	EMAIL	PHONE
Darren Green DSO	<a href="mailto:safeguarding@pafc.co.uk">safeguarding@pafc.co.uk</a>	07933 751103

Andrew Parkinson SSM	<a href="mailto:Andrew.parkinson@pafc.co.uk">Andrew.parkinson@pafc.co.uk</a>	01752 562561
Nikki Francis DLO	<a href="mailto:nikki.francis@pafc.co.uk">nikki.francis@pafc.co.uk</a>	01752 562561
Zac Newton HR	<a href="mailto:Zac.newton@pafc.co.uk">Zac.newton@pafc.co.uk</a>	01752 562561
Alison Lowman ACT DSO	<a href="mailto:Alison@argylecommunitytrust.co.uk">Alison@argylecommunitytrust.co.uk</a>	01752 562561

EFL	<a href="mailto:safeguarding@efl.com">safeguarding@efl.com</a>	
The FA	<a href="mailto:safeguarding@thefa.com">safeguarding@thefa.com</a>	

Police	<a href="mailto:101@devonandcornwall.pnn.police.uk">101@devonandcornwall.pnn.police.uk</a>	999 / 101
Prevent	<a href="mailto:prevent@devonandcornwall.pnn.police.uk">prevent@devonandcornwall.pnn.police.uk</a>	01392 225130

Plymouth Safeguarding Adults Partnership	<a href="http://www.plymouth.gov.uk/reportabuse">www.plymouth.gov.uk/reportabuse</a>	01752 668000
	(Out of hours)	01752 346984
LADO	<a href="mailto:lado@plymouth.gov.uk">lado@plymouth.gov.uk</a>	01752 668000
Samaritans		08457 909090
Ann Craft Trust	<a href="http://www.anncrafttrust.org">www.anncrafttrust.org</a>	



## Appendix B – Note and Record

If a young or vulnerable person is at risk of immediate harm: 999

If you cannot contact a member of PAFC staff: Plymouth Safeguarding Adults Partnership 01752 668000 / [www.plymouth.gov.uk/reportabuse](http://www.plymouth.gov.uk/reportabuse)

All Safeguarding concerns need to be recorded on My Concern and the DSO will be notified. On occasion when a disclosure is made, you will need to note and retain information. Use this guide to understand how to respond and how to record information. Keep all noted and information securely stored as it may be required in later investigations.

**Step 1** – Nature of the concern / what was said or witnessed

**Step 2** – Describe injuries / change of behaviour

**Step 3** – Dates, times and other factual information

**Safeguarding** is pro-active to keep adults at risk safe

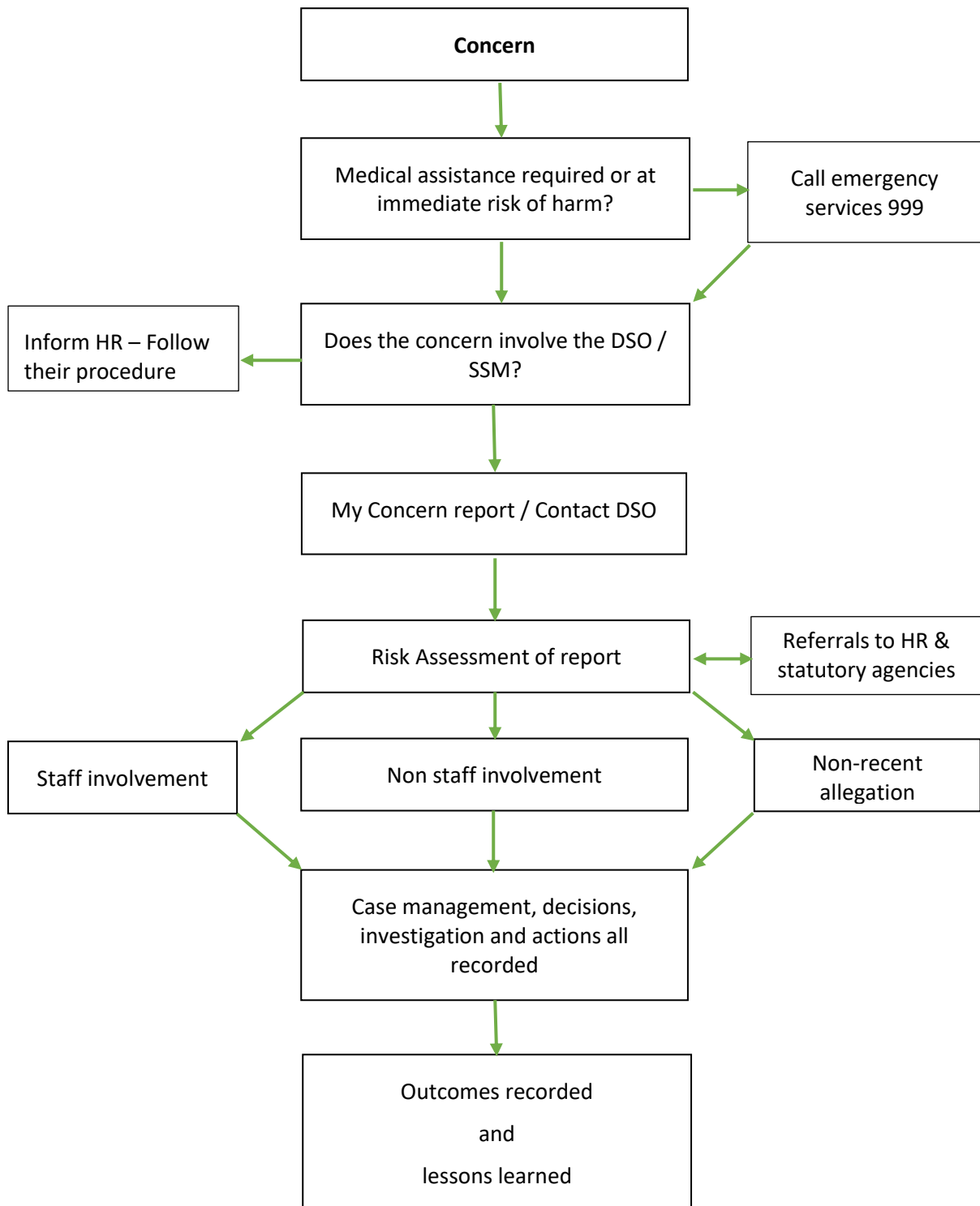
### Protection of adults at risk

- Recognise possible harm or abuse
- Look for signs, has anything you have heard or seen caused you concern?
- Respond appropriately and keep calm
- Open Questions only to allow them to clarify
- Listen, making notes and discuss your concern with your manager
- Report your concerns, do not investigate
- Contact the DSO
- Record and retain the information
- Complete My Concern report
- Seek help if the matter has affected you

It is important to keep the vulnerable person safe, but if you are able to record any information, please consider the below:

- Person of concern – name / address / postcode / DOB age / gender / phone number / NOK details
- Your details – name / contact number / when was disclosure made / who made the disclosure / what was said
- Who else have you informed? – police / social care / LADO / other
- Details of concern – Type of abuse / incident details / action taken / where appropriate has consent been obtained? / have you informed NOK or carers?

## Appendix C – Responding to a Safeguarding Concern



## Appendix D – Version History

Version	Date	Author	Status	Comment
1.0	August 2020	D Green DSO	Draft	New policy required as per EFL plan
1.1	August 2020	D Green DSO	Draft	To CEO for approval
1.2	September 2020	D Green DSO	Draft	Required crest / tidy text
2.0	August 2021	D Green DSO	Review	Amend wording update legislation
2.1	August 2021	D Green DSO	Draft	To CEO for approval
2.2	August 2021	A Parkinson	Authorised	For publication on website

