



## **Safeguarding Adults at Risk Policy**

**November 2020**

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## Safeguarding Adults at Risk

### Statement

This policy acts as a statement of intent that demonstrates a commitment to safeguard all adults at risk involved with Bradford City Community Foundation (BCCF) from harm. BCCF are committed to the ongoing support of the survivors of historical abuse in football and promote the work undertaken by affiliated football authorities.

The characteristics of adult abuse can take a number of forms and cause victims to suffer pain, fear and distress, surpassing well beyond the time of the actual incident(s). Victims may be too afraid or embarrassed to raise any complaint or they may be reluctant to discuss their concerns with other people as they are unsure who to trust or approach with their worries. There also may be some situations where victims are unaware that they are being abused or have difficulty in communicating this information to others.

### Policy Aims

- Ensure all trustees are trained and aware of all issues around safeguarding and have the skills to set direction for the organisation.
- Ensure that all staff are trained and aware of all issues around safeguarding and have the skills and knowledge to deal with any issues that arise.
- Ensure all staff are aware of the correct reporting procedures and are confident in their responsibilities.
- Ensure we adhere to relevant legislation such as the Safeguarding Adults Care Act 2014.

### Definition of Adults at Risk

**Adults at risk** are defined as an adult (person aged 18 or over) who is receiving one of the following services; health care, relevant personal care, social care work, assistance in relation to general household matters by reason of age, illness or disability, relevant assistance in the conduct of their own affairs or conveying (due to age, illness or disability in prescribed circumstances).

This **may** include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance mis-user
- Is homeless

### Our Values

1. **Empowerment** - Presumption of person led decisions and informed consent.
2. **Prevention** - It is better to take action before harm occurs.
3. **Proportionality** – Proportionate and 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 delivering safeguarding working alongside other policies:
  - Safeguarding Children Policy
  - Data Protection Policy
  - Health & Safety Policy
  - Equality Policy
  - Anti-Bullying Policy
  - Social Media Policy
  - Code of Conduct
  - Grievance and Appeals Policy
  - Safe Working Practices
  - Use of Images Policy
  - Tours, Residentials and Trips Policy
  - Confidentiality and Information Sharing Policy
  - Whistleblowing Policy
  - Staff Handbook

## Roles and Responsibilities

**The Trustees** have a duty of care to ensure that all necessary steps are taken by staff to safeguard and protect adults at risk on all projects that BCCF deliver. The safeguarding lead must review the policy annually and it is a standing item on the agenda where incidents are discussed every 3 months.

**The Chief Executive** is responsible for reviewing any serious safeguarding concerns and reporting all incidents to the trustees. They must also sign off the policy each year.

**The Designated Safeguarding Officer (DSO)** is responsible for dealing with all safeguarding concerns reported, providing advice and support to staff on the ground. They are also responsible for escalating concerns to external organisations and the Senior Safeguarding Lead within the club. All incidents will be recorded in a central file by this individual. Each year the DSO will review and update this policy.

**All staff** are responsible for addressing safeguarding concerns and ensuring they are reported to the DSO using the procedures detailed in this policy. Staff will receive training in order to successfully do this.

## Legislation

There is specific legislation designed to ensure that adults at risk are protected from harm:

- NHS and Community Care Act 1990
- Mental Health Act 1983
- Public Interest Disclosure Act 1998
- Safeguarding Adults Care Act 2014
- General Data Protection Regulations 2018

## Safer Recruitment and Staff Supervision Practices

### 1. Code of Conduct and Professional Boundaries

#### 1.1 Code of Conduct

The Safeguarding Code of Conduct aims to provide a framework for staff to support them in providing safer working practices when working with adults at risk. The Code of Conduct also helps staff to raise concerns without fear of recrimination and reduces the risk of malicious allegations being made against them.

The Safeguarding Code of Conduct can be found in appendix 1 and must be signed by all staff.

#### 1.2 Professional Boundaries and Good Practice Guidelines

All personnel are encouraged to demonstrate exemplary behaviour in order to safeguard adults at risk, to report any concerns about the welfare of an adult and also to protect themselves from allegations.

We endeavour to :

- Always respond to any request to complete or update your DBS Criminal Records Check.
- Always inform the HR Department in respect of your behaviour with regard to any investigation, allegation or arrest which may have an impact upon the role you have in working with adults at risk.
- Always work in an open environment; for example, avoid private or unobserved situations and encourage an open environment, i.e. no secrets.
- Treat all adults at risk equally and with respect and dignity.
- Always put the welfare of each adult first before winning and achieving goals.
- Always maintain a professional relationship with an adult at risk, even though they are over 18 years old, when you are responsible for their supervision, care, support or coaching.
- Always maintain a professional relationship via social media which should be used appropriately and only for business purposes - see Social Media Policy.
- Build balanced relationships based on mutual trust.
- Recognise adults at risk are vulnerable and can be educationally disadvantaged in attendance, learning, behaviour and mental health and to use this information to inform the response to further safeguarding concerns (e.g. absence, missing) and support.

### 2. Safer Recruitment Procedures for BCCF Staff and Contracted Providers

We have in place a safer recruitment procedure for individuals whom Bradford City Community Foundation and the Football Club will permit to work regularly with adults at risk.

#### 2.1 DBS & Training

We always obtain an Enhanced Disclosure and Barring check which is renewed every three years. We are responsible for ensuring that all staff are competent to carry out their responsibilities for:

- Safeguarding and promoting the welfare of adults at risk.
- Creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.

This is achieved by thorough training during induction, followed by annual training including CPD.

The Football League and the English Football League Trust (the umbrella body for all Football Community Foundations) recognises and adopts FA DBS as an appropriate umbrella body for processing Criminal Records Checks to safeguard adults at risk in football. An enhanced DBS Criminal Records Check through the above system is mandatory for all persons applying for, or currently in, such positions that are defined in law as 'Regulated Activity,' or that The FA deems relevant and whose normal duties include coaching, teaching, training & instruction, caring for & supervising or providing advice & guidance on wellbeing for adults at risk. Failure to comply with FA Disclosure and Barring process may result in sanctions and possible suspension.

We are committed to the fair treatment of our staff, potential staff and users of our services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background. We will only ask for a DBS check when the work or volunteering will involve working with children or adults at risk (please see our recruitment of offenders policy).

## **2.2 Safer Recruitment Process**

The process includes a minimum of:

- A role/job specification
- Advertisement of the role in line with club policy
- Information of whether a DBS check is to be carried out
- Shortlisting process using CV or application form
- Interview process
- Enhanced Disclosure and Barring Checks for those working with children or vulnerable adults, in line with guidance provided by the DBS, The FA and The English Football League.
- Verification of identification, appropriate qualifications and eligibility to work in the UK, including checking with The FA to ensure that the applicant is not suspended from football for all coaching.
- The taking up of two written references
- Employment offers, subject to all of the above, and a successful probationary period.

## Safeguarding All

### 3. Defining Abuse

Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take a number of forms:

- A. Physical abuse e.g. hitting, pushing, shaking, inappropriate restraint, force-feeding, forcible administration of medication, neglect or abandonment.
- B. Sexual abuse e.g. involvement in any sexual activity against his/her/their will, exposure to pornography, voyeurism and exhibitionism.
- C. Emotional/psychological abuse e.g. intimidation or humiliation.
- D. Financial abuse e.g. theft or exerting improper pressure to sign over money from pensions or savings etc.
- E. Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition.
- F. Discriminatory abuse e.g. racial, sexual or religious harassment.
- G. Personal exploitation – involves denying an individual his/her/their rights or forcing him/her/their to perform tasks that are against his/her/their will
- H. Violation of rights e.g. preventing an individual speaking his/her/their thoughts and opinions.
- I. Institutional abuse e.g. failure to provide a choice of meals or failure to ensure privacy or dignity.
- J. Self neglect e.g. where illness or behavioural condition causes an individual to neglect their personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have.
- K. Hate crime e.g. a crime motivated by racial, sexual, or other prejudice, can be one involving violence or hateful language.

### 4. Reporting Concerns

Safeguarding is a key priority for BCCF and this is highlighted in all Service Level Agreements (SLA's) with schools and other partners we work with, however BCCF always reserves the right to follow our own procedures where there is doubt or a lack of clarity in a partners procedures. Please follow these steps:

1. If you have reason to believe that an adult at risk is at **immediate risk of harm**, contact the police on **999**.
2. If you are worried about an adult, an incident has occurred, an adult has disclosed to you or there is an allegation against staff, then you need to report your concerns to the DSO (Lizzie Saunderson) via the Tootoot app or [website](#). If you do not have a login for this then please contact Lizzie, or in her absence, the Chief Executive (Ian Ormondroyd). For any concerns involving participants of the Disability Football Club, Jaimie Dorward is the DSO and must be contacted first. For high level incidents, report as soon as aware, for medium or low level report within 24 hours.
  - **Ian Ormondroyd: CEO - 01274 706850**
  - **Lizzie Saunderson: DSO – 07469234066**
  - **Jaimie Dorward: DSO for Disability Club - 07818515639**
3. If the adult needs **immediate medical treatment** take them to a hospital or call an ambulance and tell them this is a safeguarding concern. Let the DSO know what action you have taken, and inform the EFL Trust.

4. Once reported on Tootoot, the DSO can put a plan of action in place.

#### **4.1 Next Steps & Other Contact Details**

Once information is reported, the DSO will deal with the disclosure/incident/allegation and will conduct the relevant authorities.

The concern can be raised directly with Bradford Council [here](#).

If you are unable to complete the online form, please contact:

Bradford Council Adults Safeguarding Team

During working hours: Monday to Thursday (8.30am to 5.00pm) and Friday (8.30 to 4.30pm) - **01274 431077**

Out of hours: Emergency Duty Team - **01274 431010**

##### **4.1.1 Other Contacts**

Bradford Police  
**01274 437500**

Bradford Local Authority Designated Officer  
Contact for allegations against adults working in a position of trust - **01274 434343** or [cpuduty@bradford.gov.uk](mailto:cpuduty@bradford.gov.uk)

West Riding Fa  
Out of hours: **07912 309565**

Football League Child Protection Advisor  
**01772 325 811 or 07795 628 379**

FA Safeguarding Team  
**0800 169 1863** or [safeguarding@thefa.com](mailto:safeguarding@thefa.com)

English Football League Trust  
**07583 491701**

NSPCC 24 hour Helpline for advice on **0808 800 5000**

Disclose and Barring  
We would follow the referral procedure found at <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>

## Confidentiality

### 5. Information Sharing

BCCF are committed to sharing information for the purposes of safeguarding and promoting the welfare of adults in line with Safeguarding Adults The Care Act (2014) and with respect for The General Data Protection Regulations (2018). Any decision to break confidentiality should always be preceded by staff informing the complainant of what is about to happen and the reason for the decision. The staff member should also try to seek the consent of the person who makes the disclosure. There will be no breach of confidentiality if the person to whom a duty of confidence is owed, consents to the disclosure. Staff should, in the first instance, seek the consent from the person if considering sharing information with other agencies. It is therefore essential that members of staff understand the balance between the need for confidentiality and the need for the sharing of information. For that reason, they must not promise absolute confidentiality to the person who discloses any concern or allegation. Information which is considered important in protecting the safety and welfare of the child or vulnerable groups will be shared by the Club and Foundation with the appropriate statutory and regulatory agencies in order to seek help and keep those involved safe.

If a person discloses information and asks for it to be kept confidential then this person cannot be told that information (disclosure) is totally confidential since it has to be passed on or referred for help to be sought. 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. This includes (but is not limited to) the following people:

- DSO.
- The parents/guardian of the person who is alleged to be abused (only with guidance from statutory agencies).
- The person making the allegation.
- Social Services/Police.
- Chief Executive Officer
- Department Head/Direct Line Manager.
- The alleged abuser (and parents if the alleged abuser is a child) \*.

### 6. Historic Complaints

Allegations of harm or abuse may be made some time after the event, e.g. by an adult who was abused as a child or by a member of staff who is still currently working with adults at risk. Where such an allegation is made we will follow the procedures as detailed in this policy and report the matter directly to the Police or Social Services.

### 7. GDPR/Data Protection

Well-kept records are essential in situations where it is suspected or believed that an adult may be at risk of harm. The organisation has a clear policy on the management of records, confidentiality, and sharing of information, which adhere to the requirements of GDPR and the Data Protection Act 2018 (see Data Protection Policy). Trustees and staff are clear about what information can be shared with relevant people within and outside of the organisation and have access to specialist advice if they are unsure.

Information is to be stored in a secure place with limited access to designated people in line with data protection laws, so that information is accurate, regularly updated, relevant and secure.

## COVID-19 - Updated January 2021

This amendment should be read in conjunction with BCCF's Safeguarding Adults at Risk Policy and Safeguarding Code of Conduct.

### 8. Statement

The way in which our foundation is currently operating in response to coronavirus (COVID-19) is different to business as usual, however, a number of our important safeguarding principles remain the same:

- With regard to safeguarding, the best interests of adults will always continue to come first.
- If anyone has a safeguarding concern about any adult at risk connected to BCCF they should continue to act and act immediately.
- A DSO or Deputy will always be available.
- Unsuitable people are not allowed to enter the BCCF workforce and/or gain access to adults at risk.

#### 19.1 Safeguarding Contacts

Under current COVID restrictions, Safeguarding contacts for BCCF remain the same and are as follows:

**Lizzie Saunderson**

**BCCF DSO**

**07469 234066 | [lizzie.saunderson@bcfccommunity.co.uk](mailto:lizzie.saunderson@bcfccommunity.co.uk)**

**Paula Watson**

**Club Senior Safeguarding Manager**

**07967510560 | [paulawatson@bradfordcityafc.com](mailto:paulawatson@bradfordcityafc.com)**

## Appendices

### Appendix 1 - Safeguarding Code of Conduct

## Safeguarding Code of Conduct

**In its simplest form, 'safeguarding' can be defined as 'keep children, young people and adults at risk, safe from harm'.**

At Bradford City Community Foundation (BCCF), we believe that all trustees, staff, workers and volunteers share responsibility for safeguarding and promoting the welfare of children, young people and adults at risk. The Safeguarding Code of Conduct below sets out BCCF's expectations, and should be read alongside both the Safeguarding Children and Safeguarding Adults at Risk Policies.

As a member of staff, this Safeguarding Code of Conduct forms part of your contract of employment, and as a worker/volunteer it forms part of the agreement of your role. This code of conduct must be adhered to at all times, and you must read, sign and return as acceptance of your commitment to it. If you have any questions, please contact the Designated Safeguarding Officer.

Staff, workers and volunteers must abide by the following:

- All incidents or concerns (no matter how serious) that cause you to believe that a child, young person or adult at risk is, or likely to be, at risk of harm must be reported, including those regarding poor practice.
- Abuse can occur within many situations including the home, school and the footballing environment. Some individuals will actively seek employment or voluntary work with children, young people or adults at risk in order to harm them. As a staff member, worker or volunteer you must be observant in identifying situations where a young person needs protection.
- Child abuse; physical, emotional, neglect and in particular sexual abuse, can result in strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about any action to take.
- If it is brought to the attention of BCCF that a child joining the activities has been subject to child abuse outside the footballing environment, recognise that football can play a crucial role as part of a care plan or in improving a child's self esteem. In such instances BCCF will work with the referral agencies to ensure the child receives the appropriate support.
- Be aware that there is an increased focus on mental health when working children, young people and adults at risk and you must take part in training to help identify behaviour of this kind.
- BCCF will support any staff member, worker or volunteer who raises a safeguarding concern.
- Disclose any criminal record, caution, reprimand or warning (subject to filtering rules) whether received prior to or during the course of your employment.

The following must never be sanctioned. You should never:

- Share a room with any under 18's.
- Use your position to intimidate, bully, threaten, discriminate against, coerce or undermine children, young people, adults at risk, volunteers or staff.

- Engage in rough, physical or sexual provocative games, including horseplay.
- Allow or engage in any form of inappropriate touching or sexual relationships.
- Allow children to use inappropriate language unchallenged.
- Make sexually suggestive comments to a child, even in fun.
- Reduce a child to tears as a form of control.
- Take a child to your home where they will be alone.
- Carry out your duties whilst under the influence of alcohol, drugs or solvents.
- Possess any indecent images of children.
- Allow allegations made by a child to go unacknowledged, unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for children or vulnerable adults that they can do for themselves. Staff should avoid taking on any caring responsibilities for which you are not appropriately trained and for which consent forms have been obtained.

As an employee of BCCF, you will act in accordance with this Safeguarding Code of Conduct at all times. Failure to adhere may result in disciplinary action including dismissal if appropriate. In these cases where an investigation reveals that breaches have taken place, incidents will be reported to Regulatory bodies, the Local Authority and/or the police if appropriate.

**I confirm that I have read and understood BCCF's Safeguarding Code of Conduct and agree to abide by its contents.**

**Name:**

**Signature:**

**Date:**