



## **Grimsby Town Football Club**

### **POLICY AND RELATED PROCEDURES FOR SAFEGUARDING ADULTS**

**Version 1.0 - 24<sup>th</sup> February 2021**

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## **1. Information**

### **1.1 Policy Statement(s) Covered in this Document**

All statements relating to the Grimsby Town Football Club PLC, refers to the Club, the Academy and any ancillary programs run officially on behalf of the Club and will simply be referred to as Grimsby Town Football Club, GTFC or the Club” within this policy for Safeguarding Children.

### **1.2 Other Relevant Policies**

All other policies relating to safeguarding and welfare are published on the Club’s Website: [www.grimsby-townfc.co.uk](http://www.grimsby-townfc.co.uk)

### **1.3 Information / Data Security Considerations and Controls**

In producing this Policy and Related Procedures Document, careful consideration has been given to the following:

- Applying appropriate permissions regarding who is able to read and modify the document.
- Reviewing security and access permissions and finding that they are not applicable to the content of this document.
- Reviewing data protection requirements and finding that they are not applicable to the content of this document.
- Reviewing employment legislation and codes of practice requirements and applying the appropriate actions to ensure necessary compliance.

### **1.4 Adherence to Policies and Related Procedures**

Failure to comply with this Policy and Related Procedures Document may result in disciplinary action being taken.

## **2 Policy Statement(s)**

### **2.1 Safeguarding Adults at Risk**

Grimsby Town Football Club accepts it has a responsibility for the wellbeing and safety of all vulnerable groups, who are under its care or using the facilities. It is the duty of all adults working at the Club to safeguard the welfare of Adults at Risk by creating an environment that protects them from harm.

The wellbeing of vulnerable adults is paramount for all staff and accordingly, they will be made aware of the Football Club’s Safeguarding Adults at Risk Policy as part of their induction process. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

The term ‘Adult at Risk’ is defined as:

- Has needs for care and support (whether or not the local authority is meeting any of those needs).
- Is experiencing, or at risk of, abuse or neglect.
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect (Care Act 2014).

An Adult at Risk may therefore be a person who:

- Is elderly and frail due to ill health, physical disability or cognitive impairment.
- Has a learning disability.
- Has a physical disability and/or a sensory impairment.
- Has mental health needs including dementia or a personality disorder.
- Has a long-term illness/condition.
- Misuses substances or alcohol.
- Is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse.
- Is unable to demonstrate the capacity to make a decision and is in need of care and support.

This does not mean that just because a person is old, or frail, or has a disability that they are inevitably 'at risk'. For example, a person with a disability who has mental capacity to make decisions about their own safety, could be perfectly able to make informed choices and protect themselves from harm. In the context of Safeguarding Adults, the vulnerability of the Adult is related to how able they are to make and exercise their own informed choices, free from duress, pressure, or undue influence of any sort, and to protect themselves from abuse, neglect, and exploitation. It is important to note that people with capacity can also be vulnerable.

The Participation of adults may be as players, coaches, employees, volunteers, officials, administrators, or spectators.

The Club has a moral, legal, and social responsibility to provide a fun and safe environment for all those participating in these activities.

The Club has a commitment to manage and monitor allegation of discrimination, harassment, abuse and bullying.

The Safeguarding Adults at Risk Policy is in place to react to the occasions where proactive and preventative work has failed and where harm has occurred by acts of commission or omission, and where the Adult has not been able to safeguard themselves.

Its function is to ensure that safeguards are put in place to keep the Adult safe and to prevent such harm occurring again, either to the same Adult or to other Adults.

The Care Act 2014 has replaced No Secrets (2000) modernising the framework of care and support law, by setting out new duties not only for Local Authorities but also their partners, by introducing new rights for those affected by the Act, with a new emphasis on wellbeing, integration and safeguarding.

In relation to The Care Act 2014 new Safeguarding duties regarding 'Adults at Risk' include:

- An Adult Safeguarding system that seeks to prevent abuse, and / or neglect and to stop it quickly when it does happen.
- Make enquiries (or request Statutory Agencies to make them), when they think an adult with care and / or support needs may be at risk of abuse, and / or neglect and find out what action needs to be taken.
- Implement joint safeguarding strategy with Local Authorities, NHS, and Humberside Police.
- Arrange for independent advocates to represent and support a person who is the subject of a safeguarding enquiry or review, if required.
- Provide information to the Safeguarding Adults Boards if requested.

## **2.2 Differences between Grimsby Town Football Club's Safeguarding Children Policy and Safeguarding Adults at Risk Policy**

- There is no current 'Adults at Risk' Act to provide clear legislative guidance. But new introductions to the 2014 Care Act now provide clearer guidance for those who work with Adults at Risk.
- The definition of 'Adult at Risk' is always open to interpretation and individuals may be vulnerable sometimes and not at others.
- Adults have a right to self-determination. They may not wish to have others intervene to safeguard them.
- Adults may consent to sexual activities and the issue of consent may affect the reporting and management of allegations.
- There is not a uniform approach in place by the various Local Safeguarding Boards due to local authorities being organised differently with reference to how they receive and manage referrals. Up to date information is available from the Safer North East Lincolnshire Safeguarding Adults Board (Safernel):

<https://www.safernel.co.uk/contact-details/>

## **2.3 Rules and Regulations**

Grimsby Town Football Club is governed by the rules and regulations set out in the Care Act 2014, FA Safeguarding Policy, and the English Football League Rules and Guidance.

Grimsby Town Football Club also has a responsibility to maintain regular dialogue with the Safer North East Lincolnshire Safeguarding Adults Board (Safernel)

## **2.4 Aims and Key Principles**

Grimsby Town Football Club is committed to sport and physical activity being inclusive and providing a safe and positive experience for everyone involved in the Club.

Whilst it is hoped that the proactive preventative work, including training, vetting and the provision of clear policies are sufficient to safeguard all adults at Grimsby Town Football Club, the Club recognises that it has a responsibility to safeguard Adults from abuse and harm, and to respond where abuse and harm are perceived to have occurred.

### **The aims of Grimsby Town Football Club's' Safeguarding Adults Policy are to safeguard adults by:**

- Ensuring all adults, regardless of gender, race, disability, sexual orientation, religion or belief or age have the right to equal protection from all type of harm or abuse.
- Valuing them, listening to, and respecting them.
- Adopting safeguarding guidelines and best practice through procedures for employees, workers, consultants, agency staff and volunteers.
- Adopting safer recruitment and ensuring all necessary checks are made on all staff regardless of employment status.
- Sharing information about safeguarding and best practice.
- Sharing information about concerns with the appropriate statutory agencies in a confidential manner.
- Providing effective management for staff through supervision, training, and support.
- Reviewing our practice regularly and ensuring best practice.

### **The key principles underpinning this policy are:**

- The adults' safety and welfare are paramount.
- All adults have a right to be protected from abuse or neglect regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity or sexual orientation.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.

## **Promotion of the policy and supporting procedures:**

- Where possible participants and beneficiaries (and their parents / carers where they are children) will be made aware of this policy and supporting procedures upon commencement of any activity, or event and will be advised to refer to the Club website for more information or if required request a printed copy of this policy.

## **3. Procedures**

### **3.1 Overview of Documentation**

Safeguarding Adults at Risk Procedure

### **3.2 Departments Responsible**

The following departments are responsible for administering this policy:

- Safeguarding Team

## **4. Safeguarding Adults at Risk**

This policy applies to members of the Club from both the paid and volunteer workforce including work experience, and all partner organisations including contractors, consultants, and the Sports and Education Trustees. It also applies to individuals not included in this list who may be conducting related work that involves the adults at risk in our care.

All staff and volunteers must ensure that they read the safeguarding policy and procedures and understand what is required of them and their responsibilities, including how to take the correct steps to ensure the safety of all vulnerable adults and to report any concerns immediately.

Ian Fleming is the Chief Executive for Grimsby Town Football Club and is a member of the Club's Safeguarding Team. Ian Fleming's role is to support the Safeguarding Team and provide the resources necessary for the Club to operate safely and to accommodate the safeguarding needs of all Children, Young People and Vulnerable Adults, ensuring a positive outcome for all.

Philip Day Club Chairman is currently the Head of Safeguarding for GTFC (SSM) and is responsible for the overall implementation of safeguarding, safeguarding team management, case / incident management, and the safer recruitment process across the Club.

Nick Dale is on a temporary basis the Lead Designated Safeguarding Officer (LDSO) for the Club, and is responsible for the implementation, update and review of all safeguarding policies and procedures, training and delivery of the Club's safeguarding vision and commitments, together with being a point of contact for all safeguarding concerns or incidents. This is a temporary position as the Club recognises the needs, responsibilities, and commitments that it has with regards safeguarding, where a commitment has been made to employ a full-time person into role of LDSO, operating across all branches of the Football Club and its Community endeavours before the start of the 2021-22 season.

Adam Smith is the Academy Operations Manager and Designated Safeguarding Officer (DSO), with responsibility for the day-to-day implementation of Safeguarding and Player Care at the Academy, this is further supported from the Club's Welfare Officer Oliver Cowling.

Nick Dale is the Match Day DSO with responsibility for responding to all safeguarding concerns reported on a Match Day, Incident Management, and the training of the Club's casual Match Day Safety Team with regards all matters relating to safeguarding.

An accountability chart for the Safeguarding Team can be found at appendix 1, the details of the team and their contact details can be found in appendix 2 and External Agencies contact details can be found at appendix 3 of this document.

Anybody with concern about a vulnerable adult's welfare can contact either the Senior Safeguarding Manager, LDSO or any of the DSO's for advice, guidance and / or they can make a referral to the external agencies themselves, where a vulnerable adult is suspected of being at immediate and direct risk of harm. All incidents and concerns are recorded of the Club's reporting software: MyConcern.

## **5. Recruitment and Staff**

As part of Grimsby Town Football Club's recruitment and selection process, offers of employment for positions which involve working with adults at risk are subject to a satisfactory enhanced DBS check and 2 appropriate references. Refer to the Clubs Staff Recruitment Policy and the DBS Policy and Procedure for additional information.

### **5.1 Position of Trust**

As a result of the roles and authority that many of the workforce hold a position of trust in relation to those in their care. This means that they are in a position of influence over adults at risk who take part in our activities and as such have the potential to abuse that position of trust. Staff must not abuse their position for personal advantage, or gratification, or that of others. Staff also have a responsibility to report any concern they have about another member of the workforce to a Safeguarding Officer.

### **5.2 Staff Training**

The club has produced a workforce development plan for safeguarding training. Dependent on their role training is required as detailed in the work force development plan. All staff complete a Safeguarding Induction within 1 month of commencement that delivered either via an online training module or via classroom group sessions.

### **5.3 Health and Safety**

Grimsby Town Football Club's Health and Safety Policy can be found in the staff handbook which is available from line managers or on the Club's intranet. Where an adult at risk is involved, a risk assessment must take account of their particular vulnerabilities which will include safeguarding. The risk assessment should set out what arrangements are in place for their care and supervision.

### **5.4 Safer Working Practice**

The EFL guidance for safer working practice is issued to all employees at induction along with the Clubs Safeguarding Code of Conduct. Whenever possible staff should avoid situations where they are in one-to-one contact with adults at risk. When physical intervention is necessary to restore safety, restraint should not continue longer than what is considered necessary and proportionate. The Safeguarding Code of Conduct is part of this policy and all employees and volunteers sign to confirm their understanding during their HR induction. Appendix 4



## 6. Disclosure & Barring Service

Grimsby Town Football Club is registered with the Disclosure and Barring Service (DBS) under the umbrella body of the English Football League (EFL). The DBS provides a disclosure service for organisations within the EFL, with all criminal records on any DBS reported through to the Football Association. DBS disclosures enables the Club to undertake more thorough recruitment and selection procedures, especially for positions which involve working with children, young people, or vulnerable adults at risk. The Club has a separate policy for Safer Recruitment and DBS Procedures, with Adam Smith -Academy Operations Manager responsible for the DBS process for the Academy Staffing roles and Nick Dale - Club Operations & Safety Manager responsible for all non-academy personnel and their subsequent DBS checks where required.

All staff requiring a DBS will be rechecked every 3 years, subject to any amendments or policy changes made by the Football Association, EFL or DBS during pandemic times such as COVID-19.

### 6.1 New Appointments

All staff who are offered a position which involves working with children, young people, or adults at risk, will be required to undertake an enhanced DBS check and supply 2 references before employment commences. All employment offers are subject to the outcome of the Club's screening processes and where applicable, this is set out in their Offer of Employment letter. Until such time as a satisfactory Disclosure Baring Service certificate and 2 references have been received, the member of staff **will not** commence employment in any role at the Club. Any DBS checks where the Football Association (FA) has requested further information from the person subject to the DBS and sight of their DBS report, will see employment commencement placed on hold, until such time as declared safe to recruit by the FA.

Further Information with regards to DBS can be found in the Clubs DBS policy and Procedure

### 6.2 Temporary Staff and External Consultants

Grimsby Town Football Club will ensure that all temporary staff and external consultants sign a Self-Declaration form, where they will not have unsupervised access to any vulnerable groups during their employment with the Football Club. A Service Level Agreement will be in place which outlines their Safeguarding Responsibilities' and the Clubs control measures.

### 6.3 Data Protection

The Data Protection policy adopted by Grimsby Town Football Club is in line with current legislation and GDPR 2018.

## 7. Reporting a Concern

### 7.1 Highlighting Concerns

Although Grimsby Town Football Club is committed to doing its utmost to safeguard adults from harm there may be an occasion when concern is raised over the treatment of an adult. This **must** be recorded using MyConcern

If any member of the workforce has a concern about an adult, they have a duty to refer this to a member of the safeguarding team. This will then be escalated to the Senior Safeguarding Manager. If there is immediate risk of harm, a serious injury or a criminal offence has been committed then Humberside Police or other emergency services must be involved at the earliest convenience.

A flow chart showing the course of action can be found in Appendix 5

Please also refer to the following link for the full Safer North East Lincolnshire Safeguarding Adults Board referral link:

<https://www.safernel.co.uk/contact-details/>

## 8. Definitions and Symptoms of Abuse

There are 10 different types of abuse and these are:

- **Physical Abuse** – Including hitting, slapping, pushing, kicking, and deliberate misuse of medications, restraint or inappropriate sanctions.
- **Sexual Abuse** – Including rape and sexual assault or sexual acts to which the person has not or could not consent and/or was pressured into consenting.
- **Psychological Abuse** – Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, verbal abuse, isolation or withdrawal from supportive networks.
- **Financial/Material Abuse** – Including theft, fraud, and exploitation – Wills property, inheritance, possessions or benefits.
- **Neglect** – Ignoring medical and/or physical care needs, failure to provide access to health, social care or educational services, withholding necessities of life, e.g., medication, adequate nutrition and heating.
- **Discriminatory** – Including racist, sexist, based on a person's disability.
- **Domestic abuse** – Includes psychological, physical, sexual, financial, emotional abuse.
- **Self-Neglect** - Self-neglect covers a wide range of behaviour, neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- **Organisational Abuse** - Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or where care is provided within their own home. This may range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. Organisational abuse is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use.
- **Modern Slavery** - Modern Slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude.

At one end of a scale, there may be obvious signs and symptoms of abuse, but at the opposite end, the indicators may be exceedingly difficult to detect. Combinations of factors which individually might not give cause for concern could be much more worrying when considered together. The abuse may be committed by one individual against another or be institutional in that the whole organisation colludes in abusive practices either through ignorance or choice.

### 8.1 Where may harm occur?

Harm may occur anywhere in a Grimsby Town Football Club activity or it can be reported to a Grimsby Town Football Club representative (or indicative signs noticed) when it has occurred outside a Club activity.

**There are complex scenarios including:**

- Adults playing, officiating, coaching, spectating or administering within a variety of activities at Grimsby Town Football Club. Adults may be at risk of harm from other adults who may or may not be vulnerable themselves. Those doing harm to the Adults may be in the Grimsby Town Football Club activity or elsewhere in the Adults network. Harm may be deliberate or result from not understanding the Adults needs (commission or omission).
- Adults may be at risk of harming others in Grimsby Town Football Club activities either by deliberate behaviour's or by failing to understand their responsibilities to others. On these occasions the Adult may need help and support to manage their behaviour in a suitable way or may need to have certain responsibilities removed from them. Safeguards and control measures may need to be put in place to protect others.

- Adults who have been ‘at risk’ in the past who are now ‘not at risk’, (example: people recovering from mental health issues). Where these adults are seeking positions of responsibility at Grimsby Town Football Club, but have criminal records or issues from their past, which are directly related to these periods of vulnerability, detailed risk assessments will be undertaken. Assessment of suitability for their new roles requires a specific knowledge base and sensitive handling. Whilst Grimsby Town Football Club promote a policy of inclusion, the risk assessments are conducted to measure the risk posed by somebody who is recovering from a previous period of vulnerability, considering other Adults and children who need safeguarding from possible harm, should the risk factors re-emerge.
- Adults may also be at risk of harming themselves through failing to realise and report when they need additional or different support in Grimsby Town Football Club activities.

## **9. Staff and Volunteers Responsibilities**

### **9.1 Creating the atmosphere for someone to tell you what is wrong**

The coordinator of each activity involving Adults at Grimsby Town Football Club will ensure that the participants know how to get help, how they can report abuse, who to report it to and what response they can expect, notify individuals that a team of Safeguarding professionals exists, with a Senior Safeguarding Manager and their contact details available.

Some people who have been abused appear able to speak to someone about it and wish action to be taken. Others seem to be very reluctant to talk about the experience.

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

## **10. Responding to a Report or Suspicion**

It is not the responsibility of Staff, or Volunteers to decide if abuse has taken place, it is their responsibility to take appropriate steps to ensure that all suspicions and allegations of abuse and poor practice are taken seriously and reported immediately and appropriately together with recording the matter within MyConcern (see Recording allegations or suspicions below).

If a member of the Club’s workforce has a concern about a vulnerable adult, it is their “duty to refer” these to a Designated Safeguarding Officer (DSO) who will in turn report it to the Senior Safeguarding Manager or the Local Authority’s Safeguarding Adult Team (Safernel) or the Local Authorities Designated Officer (DO) where immediate harm or threat or harm is suspected and potentially Humberside Police.

With regards to adults at risk, there is no requirement to gain consent to refer it to the Senior Safeguarding Manager, however consent must be obtained to refer it to an outside agency. The member of staff should record whether consent was given or not however any situations of doubt for referral to external bodies such as the Local Authority or Humberside Police can be discussed with the EFL for guidance and further advice, especially where there is risk of significant harm.

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

The following guidelines are in place to offer help and support for staff and volunteers with regards to abuse or a suspicion of abuse:

#### **Do:**

- If the Person is injured or not yet safe, take immediate action to help them by calling the relevant emergency service.
- Stay calm and try not to show shock.
- Listen carefully rather than question directly.
- Always treat any allegation seriously and act towards the adult as if you believe what they are saying.

- Tell the adult they are right to tell you.
- Reassure them that they are not to blame.
- Be honest about your own position, who you must tell and why.
- Tell the adult what you are doing and when and keep them up to date with what is happening.
- Listen to what they want to happen and include them in any decision making.
- Take further action – you may be the only person in a position to prevent future abuse.
- Write down what you have been told, (but do not let writing things down stop you from having eye contact as this may prevent the adult person talking to you).
- Seek medical attention if necessary.
- Inform the Lead Designated Safeguarding Manger or appropriate Designated Safeguarding Officer, who must inform the Senior Safeguarding Manager.
- The Lead Designated Safeguarding Officer will contact the Adult Safeguarding team at the North East Lincolnshire Council without the Adults consent in certain circumstances but the adults wishes will be made clear throughout.
- If a referral is made and the adult is reluctant to have the incidents investigated this fact will be recorded and brought to the attention of the Senior Safeguarding Manager.
- Where appropriate record on a body map the location of any cuts, bruises or abrasions (Appendix6).

**Do not:**

- Make Promises not to tell.
- Interrogate the adult – it is not your job to carry out an investigation – this will be up to Humberside Police and social workers, who have experience in this.
- Cast doubt on what the adult has told you, do not interrupt or change the subject.
- Say anything that makes the adult feel responsible for the abuse.
- Take photographs of any injuries.

**DOING NOTHING IS NOT AN OPTION, IT IS YOUR RESPONSIBILITY TO ACT** – Make sure you tell the Designated Safeguarding Officer (DSO) immediately, they will know how to follow this up and where to go for further advice.

## **11. Recording Allegations or Suspicions**

The Lead Designated Safeguarding Officer (LDSO) or the Senior Safeguarding Manager will ask for a written factual statement from the person making the report.

The Club will keep a record of all incidents and concerns reported to its Safeguarding team within its electronic recording system MyConcern.

If the report involves an allegation about another member of staff, that person will also be asked to write a brief report. Any statement made by the vulnerable adult should be reported in their own words. These reports should be confined to facts and should not include any opinion, interpretation or judgment.

Grimsby Town Football Club will ensure that any vulnerable adult concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. The Lead Designated Safeguarding Officer should seek the advice of the Club's Senior Safeguarding Manager and Safeguarding Team, who may also refer this to the EFL Head of Safeguarding, or The Football Association Safeguarding Children & Vulnerable Adults Team, North East Lincolnshire's Safeguarding Adult's Board (Safernel), or Humberside Police, before setting up an internal inquiry where they have sought advice on informing the vulnerable adult's parents / carer. The parent / carer should only be informed with the consent of the vulnerable adult at risk, where they have capacity to consent in this situation. In any case of suspected abuse, as soon as the local Adults Department has been informed, Grimsby Town Football Club must provide a report to the EFL's Head of Safeguarding and The Football Association Safeguarding Children & Adults at Risk Team.

### **11.1 The information needed**

- Name, date of birth, address of the alleged victim.
- Name, date of birth, address of the alleged perpetrator.
- Who you are and how you are involved?
- What happened, where and when.
- Action taken.
- The current position including any concerns about safety of the alleged victim and any other person.
- Who else is involved?
- How aware of the referral is the victim, perpetrator, carers, or relatives.
- Any known views of the alleged victim regarding how they wish the matter to be dealt with.
- Who else has been informed?

### **11.2 Recording**

The following points should be considered in recording a disclosure or allegation:

- Use black ink so it can be photocopied.
- Ensure the report is legible.
- Sign and date the report.
- Note the time of day, date and location of the incident.
- Describe how the disclosure came about.
- Describe what happened and any injuries or consequences for the victim.
- Where appropriate use a body map to indicate where there are cuts or bruises.
- Keep the information concise and factual.

### **11.3 Establishing the alleged victims wishes**

It is especially important that you do not investigate the concerns, but the following guidance should be followed:

- Where there is no emergency there is an opportunity to check out the adult wishes in relation to the concern.
- There is a need to establish who the victim would most like to talk to about the matter.
- Liaise with the Lead Designated Safeguarding Officer or Senior Safeguarding Manager.
- The member of staff chosen must familiarise themselves with all the possible options and prior to the interview seek advice regarding the potential consequences of each option for the victim.
- Remember the interview is only about establishing what the victim wishes to do about the incident and not about discussing the incident itself.
- Important to allow the victim time to consider the options and if there is uncertainty offer to meet again.
- If others are at risk of harm or a criminal offence has taken place you have to report, and this should be explained to the alleged victim.

### **11.4 Ensuring the individual is in or is moved to a place of safety**

It is essential that, whatever the nature of the suspected abuse, the vulnerable adult is separated from the person who is or is thought to be producing the threat. It is important that disruption to the life of the victim is kept to a minimum, therefore if it is possible for the alleged perpetrator to leave the scene, this should be the preferred option. Although if it is not achievable, an alternative place of safety should be sought as the immediate safety of the victim is the highest priority.

### **11.5 How to get help urgently**

Emergency services should be summoned whenever a situation is felt to be beyond the control of members of staff. In addition, staff should have readily available all the contact numbers of the Lead Designated Safeguarding Officer, Senior Safeguarding Manager and the Safeguarding Team colleagues, or other services which can assist in an emergency or urgent situation.

## **11.6 Role of staff supporting the alleged victim**

Members of staff involved in supporting the alleged victim have a key role in making sure the procedures are followed and that the victim is properly advised and supported. If several members of staff are involved, it may be convenient for one person to take the lead. This is entirely a matter for the staff and Senior Safeguarding Manager or Lead Designated Safeguarding Officer to decide in the light of the individual circumstances.

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

- Ensuring the continued safety of and support to the abused person.
- Liaising with immediate colleagues who have been involved in order to gather all the available information together.
- Ensuring that evidence has been preserved.
- Collating and completing all written material relating to the incident.
- Reporting the matter to the Lead Designated Safeguarding Officer or Senior Safeguarding Manager at the earliest opportunity.

***IT IS NOT PART OF THE ROLE OF THE STAFF SUPPORTING THE VICTIM TO COMMENCE AN INVESTIGATION INTO THE INCIDENT***

## **11.7 Role of the Lead Designated Safeguarding Officer or the Senior Safeguarding Manager**

For the purpose of the management of a safeguarding adult's situation, the Lead Designated Safeguarding Officer or Senior Safeguarding Manager for the specific activity in which the incident or concern arises should be consulted. In the absence of the Lead Safeguarding Officer or Senior Safeguarding Manager or if they are implicated in the abuse, an alternative Designated Safeguarding Officer must always be identified to deal with the matter.

The role of the Lead Designated Safeguarding Officer comprises of the following:

- Directly managing and supporting the staff involved in the situation.
- Ensuring that action taken is effective in providing immediate and ongoing protection to the vulnerable adult.
- Ensuring that practical and emotional support is available according to need.
- Reporting the incident to the Senior Safeguarding Manager and the EFL.
- Should a referral be required to the Local Authority Adult Safeguarding Team contact should be made by contacting North East Lincolnshire Councils Single Point of Contact on: 01472 256256, with this line managed 24/7, 365 days a year.
- In the absence of the Lead Designated Safeguarding Officer or the Senior Safeguarding Manager, the Designated Safeguarding Officer will need to communicate with the Adult Safeguarding Team via the single point of contact to ensure the procedure is correctly followed.
- Where an allegation is made against a member of staff or a volunteer at Stoke City FC, the Head of Safeguarding will liaise with the HR team to invoke the Suspension procedures.
- The HR team will take responsibility for ensuring that the appropriate support is offered to the person who is suspended.

## **11.8 Confidentiality**

There is always tension and caution around issues of confidentiality. The advice for all staff at Grimsby Town Football Club is that no guarantee of confidentiality can be given to a child or adult at risk. All staff have a professional responsibility to share information with other agencies to safeguard a child, young person, or vulnerable adult.

An adult should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present.

There are actions which staff are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. Any report, incident or interview must be strictly confidential on a need-to-know basis, where staff should not have any reservations about referring any safeguarding issue to a Clubs Safeguarding Officer. The key issue is that the welfare of the child, young person or vulnerable adult is protected.

## 12. Low Level Concerns

It has been recognised by the Club that there is a need to manage issues that fall under the umbrella of safeguarding, including those which are considered to be of a minor nature. These matters are classified as 'Low Level Concerns'. Handling such concerns appropriately and proportionately will strengthen confidence of staff and volunteers in the Club.

Where Low Level concerns are shared with a designated safeguarding member of staff in accordance with the Clubs safeguarding policy, where they must be recorded as per the normal process for managing Safeguarding issues on MyConcern.

What is a Low-Level Concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that a person may have acted in a manner inconsistent with the Club's Safeguarding Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to their behaviour. By reporting such concerns, it helps us to build a picture and potentially identify and resolve issues before any child, young person or vulnerable adult is subject to abuse or harm.

Low Level Concerns where no emergency actions are required, should be managed internally, and recorded within the MyConcern electronic Safeguarding management system and entitled 'Low Level Concern' in the '**Concern Summary**' section.

Low Level Concerns do not in any way override or replace the Clubs 'Whistle Blowing Policy' but compliment and work alongside that process.

Two Examples of Low-level Concerns:

**Physical** - Staff error causing no/little harm, e.g. skin friction mark due to ill-fitting bib during football/PE session

**Psychological** – This could be an isolated incident where an adult, adult at risk or child is spoken to in a rude or inappropriate way – respect is undermined but little or no distress caused.

This list is not limited to the above but is extensive and any uncertainty should be discussed with the Head of Safeguarding or Club Safeguarding Officers.

### **Contact Details for the NELC Safeguarding Adults Team & NELC Designated Officer**

**Single Point of Contact: 01472 256256**

(This line is managed 24 hours a day and 265 days a year)

**Designated Officer Charlotte Allenby: 01472 - 326118 Email: CSRS@nelincs.gov.uk**

The DO or Families First Team will advise the Club on the action to take in certain situations, where a concern or allegation has been received relating to staff, the employee will be removed from working with vulnerable groups until the investigation has been concluded.

**In all circumstances the allegation details will be reported to the Football Association and the English Football league (EFL).**

### **13. Safeguarding within Partnerships Policy**

The Club recognises its responsibility to safeguard the welfare of all Children, Young People and Adults at Risk participating in Club activities and when participating in activities arranged in partnership with an external service provider.

The Club is committed to working within partnerships to provide a safe environment for all Children, Young People and Adults at Risk by utilising the local Safeguarding Policies and Procedures to protect vulnerable groups from physical, sexual or emotional harm, neglect, bullying or exploitation.

The Clubs commitment to safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to Children or Adults at Risk of Harm.

Partnership agreements will include the following:

- All partners will be made fully aware of their areas of safeguarding responsibilities.
- In the event of a safeguarding concern arising, local safeguarding policies and procedures will be followed.
- An agreement confirming safe recruitment procedures have been followed.
- If appropriate level DBS checks and self-declarations have been undertaken.
- Agreement on the level of supervision to be provided by the partner during the activity.
- If the provider has valid public liability insurance.
- What safeguarding training has been undertaken by the deliverers.
- Health & Safety, Codes of Conduct etc.
- Who has responsibility for completion of consent forms (e.g., medical and image consent), registration, record keeping and risk assessments?
- Details of First Aid arrangements.
- Clear guidance on the reporting of Safeguarding concerns or concerns regarding Poor Practice during and outside of normal office hours.
- Name and contact details of staff to whom Safeguarding concerns, or concerns regarding poor practice, should be reported.
- Information for participants and their parents/carers that provides details of how to report a Safeguarding concern.
- What evaluation procedures are in place to gain the vulnerable groups' views about the activity.
- The period by which the safeguarding arrangements in the agreement will be reviewed.

### **14. Use of Images**

Grimsby Football Club takes its guidance on the use of images from guidelines issued by the FA and EFL. All photographs are taken by persons who have been briefed by the Activity Manager responsible for the activity being photographed.

- Before taking photographs of vulnerable adults, please refer participants to the Grimsby Town Football Club policy located on the Club website.
- The vulnerable adult or their parent / carer will be informed of how the image will be used. The person running the activity will not allow an image to be used for something other than that for which it was initially agreed.
- All vulnerable adults featured in publications must be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific vulnerable adult.
- Where appropriate, images represent the broad range of users participating safely in football.
- Designated photographers will undertake a DBS check, attend training and will be personally responsible for keeping up to date with the latest guidelines on the Use of Images Policy. Identification will be always worn by them.
- Vulnerable adults who are under a court order will not have their images published in any document.
- No images of vulnerable adults at risk featured in publications will be accompanied by personal details.
- Any instances of inappropriate images in football should be reported to the Designated Safeguarding Officer and Humberside Police without delay.



## 15. Club Safeguarding Policy – COVID-19

This amendment should be read in conjunction with the Club Safeguarding Policy, Safeguarding Code of Conduct, Players Code of Conduct and the Clubs various COVID-19 policies and risk assessments.

### CLUB STATEMENT:

The way in which Grimsby Town Football Club is currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, several of our important safeguarding principles remain the same:

- With regards to safeguarding, the best interests of children and adults at risk will always continue to come first.
- If anyone has a safeguarding concern about any child, young person or adult at risk connected to the Club, they should continue to report and report concerns / incidents immediately.
- A Designated Safeguarding Officer or Deputy will always be available to assist and help.
- Unsuitable people are not allowed to enter the Clubs workforce and / or gain access to children, with DBS checks still in place as part of the Clubs Safer Recruiting procedures.
- Children, young people and adults at risk continue to be protected when they are online.

## 16. Safeguarding Contacts in Football

Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance, we recognise that this may not always be possible or appropriate. Below are the contact details for footballing partners with whom safeguarding concerns in relation to the Club can be discussed:

The English Football League Safeguarding Team  
Tel: 01772 325940  
Email: [safeguarding@efl.com](mailto:safeguarding@efl.com)

North East Lincolnshire Council, Safeguarding Adult Team (Safernel)  
Tel: 01472 256256  
Designated Officer: Charlotte Allenby  
Tel: 01472 326118  
Email: CSRS@nelincs.gov.uk

If the concern regards a person employed in footballs conduct towards a child, young person or vulnerable adult:

The FA Safeguarding Team  
Tel: 0800 169 1863  
Email: [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)

## 17. Procedures and Safety Measures for Online Learning & Mental Health

The Club expects all staff, volunteers and players to adhere to the relevant Online Policy. Professional boundaries must be always maintained. We have put extra measures in place to reduce the risks in relation to online learning. These are fully detailed within the Club Electronic Communication Guidance Policy and the Academy Electronic Communication Guidance Policy.

### 17.1 Mental Health

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of us all. Players who are struggling under the current circumstances should contact the Club safeguarding Team as outlined above. Support can also be accessed through several national organisations including:

The Samaritans

Tel: 116 123 (call are free of charge)

Website: <https://www.samaritans.org/>

Email: [jo@samaritans.org](mailto:jo@samaritans.org)

Child Line

Tel: 0800 1111

Website: <https://www.childline.org.uk/>

NSPCC

Tel: 0808 800 5000

Website: <https://www.nspcc.org.uk/>

### 17.2 Online Safety

It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this lockdown period. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online.

These include:

UK Safer Internet Centre <https://reportharmfulcontent.com/>

CEOP <https://www.ceop.police.uk/safety-centre/>

Internet Matters <https://www.internetmatters.org/>

NetAware <https://www.net-aware.org.uk/>

ParentInfo <https://parentinfo.org/>

ThinkuKnow <https://www.thinkuknow.co.uk/>

## 18. Document Control

### 18.1 Approval and review procedure

The Chief Executive and Chairman of the Club are both responsible for reviewing annually this policy, including any updates and must issue approval for publication before this policy is released to staff.

It is the responsibility of the Lead Designated Safeguarding Officer to update this policy with regards any legislation changes or changes to Club policies and to make sure that it is reviewed and updated as a minimal standard annually.

The Clubs Designated Safeguarding Officers are responsible for ensuring all branches of the Football Club has received, read and understood this policy and to provide guidance and assistance where required for all safeguarding issues / incidents.

The Academy Manager is responsible for reviewing this document, ensuring that the Academy meets the defined Safeguarding standards and that all staff have read this policy and received Safeguarding training.

Department Heads or Managers are responsible for the reading of this document, implementing the required adherence to safeguarding standards and for ensuring that all team members have read and understood the policy. Department Heads or Managers also have within their responsibilities a duty to ensure that training has been provided for all new starters, with refresher training for all staff every 2 years.

### 18.2 Senior Management responsible for the approval and review of this policy

It is the responsibility of the Chief Executive and the Senior Safeguarding Manager (Club Chairman) to approve this policy and the annual review and updates as required.

### 18.3 Frequency of review of this policy

This policy must be reviewed by the Lead Designated Safeguarding Officer at least once a year or whenever there is an organisational change, change in legislation or following any learning outcomes from safeguarding incidents, concerns or allegations.

### 18.4 Senior Management responsible for the approval and review of all Safeguarding related procedures

It is the responsibility of the Chief Executive and the Senior Safeguarding Manager (Club Chairman) to approve and review all Club related Safeguarding procedures.

### 18.5 Author and Approval

<b>Document Author:</b>	<b>Reviewed by:</b>	<b>Date Approved:</b> (or re-approved on changes)
Nick Dale Operations & Safety Manager & Lead Designated Safeguarding Officer	Philp Day Club Chairman & Senior Safeguarding Manager (SSM)	24 <sup>th</sup> February 2021
	Ian Fleming Chief Executive & Executive Management Team Lead	24 <sup>th</sup> February 2021

**18.6 Document Issuer, read by, and date policy read.**

<b>Document Issuer:</b>	<b>Name &amp; Job Role:</b>	<b>Date Read:</b>
<p>Nick Dale Operations &amp; Safety Manager &amp; Lead Designated Safeguarding Officer (LDSO)</p>	<p>Adam Smith Academy Operations Manager (DSO)</p>	26 <sup>th</sup> February 2021
	<p>Lucy Stephenson Event Safety Manager (DSO)</p>	26 <sup>th</sup> February 2021
	<p>Lee Robinson Deputy Safety Officer (DSO)</p>	26 <sup>th</sup> February 2021
	<p>Neil Woods Academy Manager</p>	26 <sup>th</sup> February 2021
	<p>Steve Wraith Accounts Manager</p>	26 <sup>th</sup> February 2021
	<p>David Smith Commercial Manager</p>	26 <sup>th</sup> February 2021
	<p>Rae Walker Shop Manager</p>	26 <sup>th</sup> February 2021
	<p>Lisa Piggott Ticket Office &amp; McMenemy's Manager</p>	26 <sup>th</sup> February 2021
	<p>Paul Hurst First Team Manager</p>	26 <sup>th</sup> February 2021
	<p>Dale Ladson Media Manager</p>	26 <sup>th</sup> February 2021

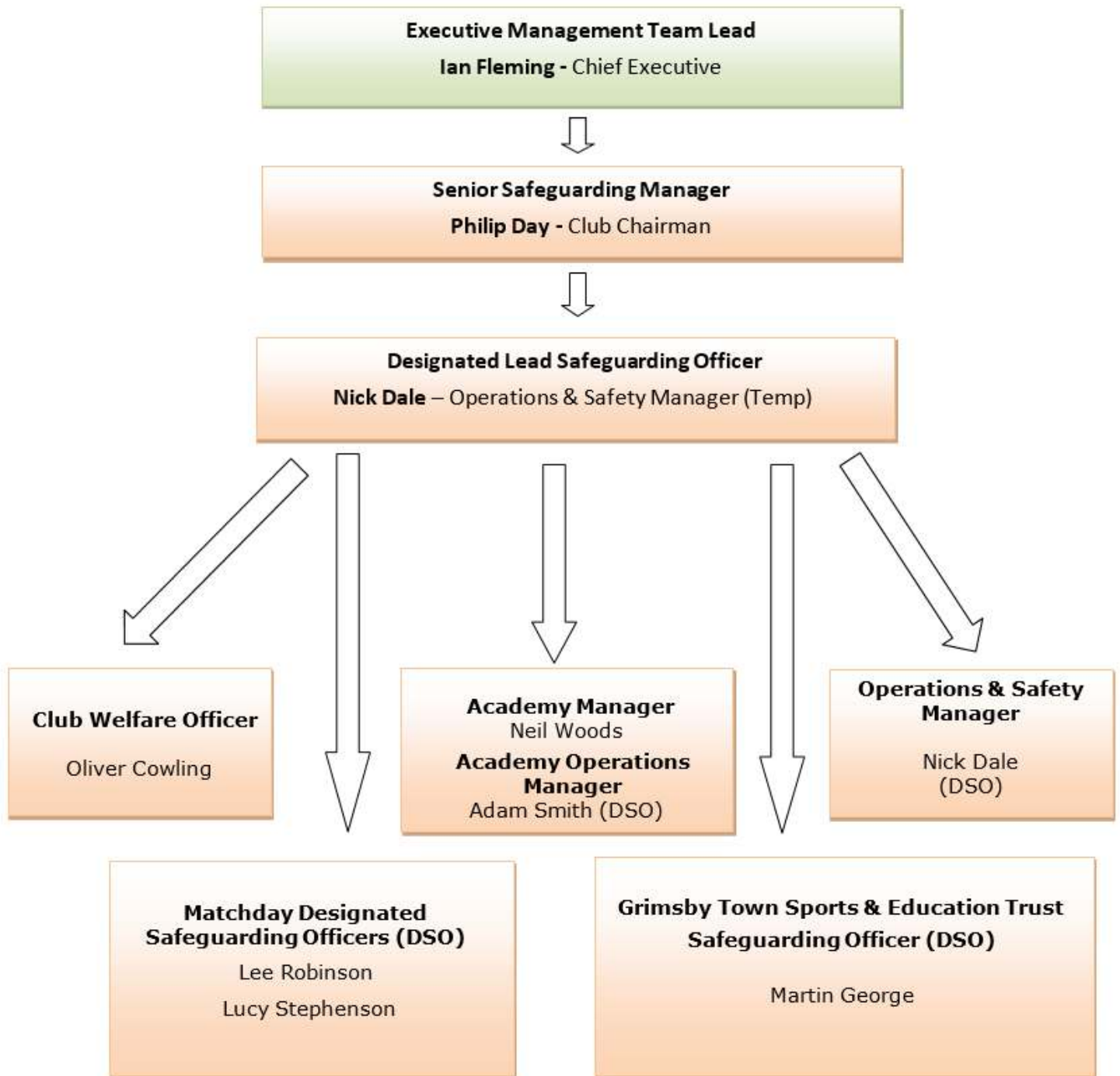
**18.7 Document History**

<b>Version</b>	<b>Date</b>	<b>Comment</b>	<b>Author</b>
1.0	24 <sup>th</sup> February 2021	Draft	Nick Dale
1.1	25 <sup>th</sup> February 2021	Final Version	Nick Dale

## **19. Appendices**

- 1.** Safeguarding Team Accountability Chart
- 2.** Safeguarding Team Internal Contacts
- 3.** Safeguarding Team External Contacts
- 4.** Safeguarding Code of Conduct
- 5.** Reporting Flow Map
- 6.** Body Map
- 7.** Preserving the Evidence
- 8.** Capacity
- 9.** Signs and Symptoms of Abuse
- 10.** Key Government Initiatives and Legislation

# Appendix 1 - Safeguarding Team Accountability Chart



## Appendix 2 – Safeguarding Team Internal Contacts

**Club Chairman & Senior Safeguarding Manager (SSM)**

**Email:** [philip.day7@icloud.com](mailto:philip.day7@icloud.com)

**Mobile:** 07831 623780

Ian Fleming

**Chief Executive & Executive Management Team Lead**

**Email:** [ian@gtfc.co.uk](mailto:ian@gtfc.co.uk)

**Tel:** 01472 605050 Ext: 8002

**Mobile:** 07711 188542

Nick Dale

**Operations & Safety Manager - Lead Designated Safeguarding Officer (temp) (LDSO)**

**Email:** [nick@gtfc.co.uk](mailto:nick@gtfc.co.uk)

**Tel:** 01472 605050 Ext: 8008

**Mobile:** 07737 371466

Neil Woods

**Academy Manager**

**Email:** [NeilWoods@gtfc.co.uk](mailto:NeilWoods@gtfc.co.uk)

**Tel:** 07508 395671

Adam Smith

**Academy Operations Manager & Designated Safeguarding Officer (DSO)**

**Email:** [AdamSmith@gtfc.co.uk](mailto:AdamSmith@gtfc.co.uk)

**Tel:** 07415

454153

Graham Rodger

**Sports & Education Trust Chief Executive**

**Email:** [Graham@gtfc.co.uk](mailto:Graham@gtfc.co.uk)

**Tel:** 07902

267464

Martin George

**Sports & Education Trust Safeguarding Officer (DSO)**

**Email:** [Martin@gtfc.co.uk](mailto:Martin@gtfc.co.uk)

**Tel:** 07807

490319

Lucy Stephenson

**Event Safety Manager – Matchday (DSO)**

**Email:** [Lucy5551@live.com](mailto:Lucy5551@live.com)

**Tel:** 07950

701135

Lee Robinson

**Deputy Safety Officer – Matchday (DSO)**

**Tel:** 07808 298490

## Appendix 3 - Safeguarding External Contacts

Alex Richards  
**EFL Head of Safeguarding**  
Email: [Arichards@efl.com](mailto:Arichards@efl.com)  
Tel: 01772 325940

**North East Lincolnshire Council – Safer and Stronger Communities**  
Email: [Safer.Communities@nelincs.gov.uk](mailto:Safer.Communities@nelincs.gov.uk)  
Tel: 01472 324981

Charlotte Allenby  
**North East Lincolnshire Council – Safeguarding Designated Officer (DO)**  
Email: [CSRS@nelincs.gov.uk](mailto:CSRS@nelincs.gov.uk)  
Tel: 01472 326118

**Humberside Police**  
Tel: 101 non-emergency  
Tel: 999 Emergency

**North East Lincolnshire Council Adult Social Care – Single Point of Contact**  
Tel: 01472 256256



## Appendix 4



# Grimsby Town Football Club

## SAFEGUARDING CODE OF CONDUCT

### Staff & Volunteers

### Version 1.5 – 19<sup>th</sup> February 2021

#### Overview:

Everyone plays a role in safeguarding the welfare and development of children, and the protection of other vulnerable people. As an individual responsible for children or other vulnerable people taking part in a Grimsby Town Football Club activity you have a duty to:

1. Ensure the safety and welfare of vulnerable groups is a priority and taken into consideration when planning any activity or session,
2. Respond quickly and appropriately to any concerns about a child, young person, or vulnerable adult,
3. Report safeguarding concerns or allegations to your Line Manager, Designated Safeguarding Officer, Lead Designated Safeguarding Officer, or the Senior Safeguarding Manager.
4. Ensure high standards of propriety and behaviour at all times and always maintain professional boundaries.
5. Ensure that staffing ratios are adhered to, taking into account additional vulnerabilities, age, and disability.
6. Challenge unacceptable behaviour including rough play, bullying and report any issues, complaints, or concerns.
7. Carry out and check risk assessments as appropriate, ensuring you are familiar with the emergency action and first aid procedures.
8. Ensure the correct permission has been received for the taking of images and video recording of vulnerable groups, and only use authorised equipment.
9. Listen to, encourage & praise vulnerable groups and involve them in decision making, take their ideas seriously and give constructive feedback.
10. Treat children, young people, and other vulnerable groups with respect, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation, or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.

**Staff and volunteers should follow guidance for safe working practices, maintaining clear boundaries between professional and personal life. Staff should protect themselves from compromising situations such as:**

1. Do not give lifts to children, young people, or vulnerable adults except when organised by the Club and in line with Club policies.
2. Do not have inappropriate physical, verbal, or written contact with vulnerable people or take part in rough or physical or sexually provocative games, including horseplay.
3. Do not have personal direct electronic communication with any child, young person, or vulnerable person (e.g., email, text, Facebook) All Contact should be professional and in line with club policy.
4. WhatsApp and its use are strictly prohibited for use with any person aged under 18 and for use with vulnerable adults.
5. Do not engage in sexual activity, betting, gambling, or related activities or have discussions about these activities in front of and child, young person, or vulnerable adult except in a clear educational context where it's your documented responsibility to deliver such training.
6. Do not allow inappropriate or bad language, always challenge unacceptable behaviour.
7. Do not reduce a child, young person, or vulnerable adult to tears as form of control of bullying.
8. Do not allow allegations made by a child, young person, or vulnerable adult to go unchallenged, unrecorded, or not acted upon, report all concerns to your Line Manager, Designated Safeguarding Officer or Club Chief Executive.
9. Do not do things of a personal nature for a child, young person or vulnerable adult that they can do for themselves.
10. Wherever possible, ensure that more than one member of the workforce is present when working in the proximity of children, young people, or vulnerable adults. It is inappropriate to spend excessive time alone with any vulnerable person you supervise, or care for, or to take them to your home.
11. Do not accept bullying, rule violation or the use of prohibited substances, including alcohol.
12. Do not be under the influence of alcohol or non-prescribed drugs whilst performing any function for the Club.
13. You are strictly prohibited from smoking whilst on duty and can only smoke during authorised breaks, where you must be off the Club property. You must not smoke during any break in front of children, young people, or vulnerable adults.
14. Do not take, or use unauthorised images, or video footage of any child, young person, or vulnerable adult. This includes uploading images or video footage to social media sites such as Facebook, LinkedIn, twitter etc. Written consent for the taking of images and their subsequent use must be sort from a parent or guardian.
15. Do not use personal devices to take photos or videos of vulnerable people.
16. Ensure you maintain healthy, positive, and professional relationships with all children, young people, and vulnerable adults. Staff in positions of authority and trust in relation to aged 16 and 17 years or adults at risk must not engage in sexual relationships.

A Breach of the Safeguarding Code of Conduct may result in disciplinary action, possibly leading up to dismissal. Serious breaches may result in a referral to the DBS (Disclosure and Barring Service), Humberside Police and North East Lincolnshire Council (Local Authority).

Cases of poor practice will be reported to the relevant Football authorities including the EFL's Safeguarding Team.

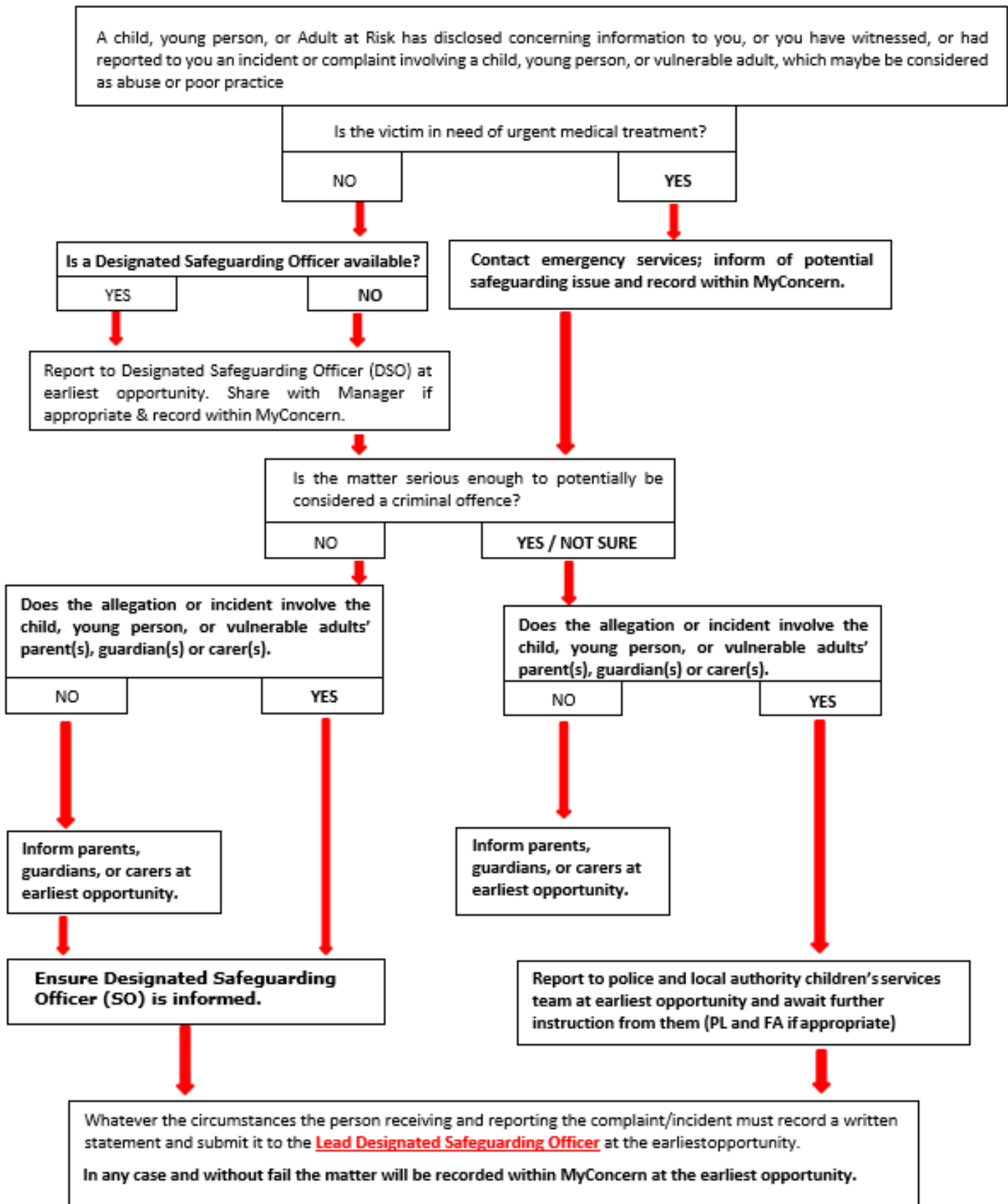
Discriminatory, Offensive and Violent behaviour are unacceptable, and complaints will be acted upon and are dismissible offences.

\* The term “child”, “children”, or “young Person” applies to anyone under 18 years of age. Vulnerable adults refer to any person aged over 18, who is, or may be in need of community care services by reason of mental, or other disability, age, or illness; and who is or may be unable to take care of themselves against significant harm or exploitation, discrimination: prejudice, unacceptable oppressive or offensive behaviour or language in relation to age, culture, disability, ethnicity, gender, sexual orientation, marital status, race, religion, or belief, transgender status. \*

<b>Signature of Staff member or Volunteer:</b>	
<b>Print Name of Staff member or Volunteer:</b>	
<b>Club Role / Post:</b>	
<b>Date:</b>	

## Appendix 5 – Reporting Flow Chart

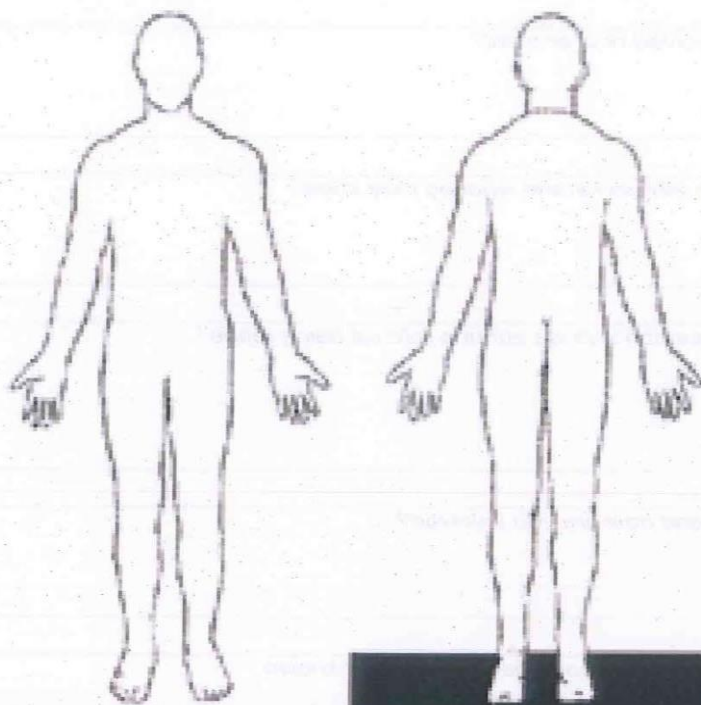
### Reporting Flow Chart



## Appendix 6 – Body Map

### BODY MAP

Please mark on the body map any bruising/friction marks, burns, etc. Describe the injury, e.g., shape, size, colour, skin broken, swelling, scabbing, blistering, and bleeding.



**Front**

**Back**

## Appendix 7 – Preserving the Evidence

### Preserving the evidence

Your first concern is the safety and welfare of the abused person, however your efforts to preserve evidence may be vital. In all cases, but especially when police involvement is required, preservation of evidence is crucial if the police investigation is to be effective. What you do, or do not do in the time whilst you are waiting for the police to arrive may make all the difference.

The following checklist aims to help you to ensure that vital evidence is not destroyed:

#### In situations of physical and/or sexual assault

- In the case of a person who has been physically abused who wishes to show you an injury, only observe what they consent to show you and what is appropriate.
- Do not touch what you do not have to, wherever possible leave things as they are. Do not clean up, do not wash anything, or in any way remove fibres, blood etc. If you do have to handle anything at the scene keep this to a minimum and where possible wear nitrile disposable glove.
- Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum and place the items / weapons in a clean dry place until the police collect them.
- Preserve anything that was used to comfort the abused person, for example a blanket.
- Secure the room, do not allow anyone to enter unless strictly necessary to support you or the abused person and / or the alleged perpetrator, until Humberside Police arrive.
- The Police may organise a medical examination urgently.

#### Prior to the arrival of the police and medical examination:

- Ensure that no one has physical contact with the abused person and the alleged perpetrator as cross- contamination can destroy evidence. It is acknowledged that if you are working alone in the situation, you may have to comfort both the abused person and the alleged perpetrator e.g., where the alleged perpetrator is also a GTFC service-user, therefore you need to be aware that cross-contamination can easily occur.
- Preserve any bloodied items.
- Encourage victim not to shower.
- Encourage victim not to change clothing.
- Even when the victim says they do not want police involvement, preserve items anyway as they may change their mind later.
- Encourage the person not to eat or drink if there is a possibility that evidence may be obtained from the mouth.

#### Methods of Preservation

- For most things use clean brown paper, if available, or a clean brown paper bag or a clean envelope. If you use an envelope, do not lick it to seal. Avoid using plastic bags as they can produce moisture.
- For liquids use clean glassware.
- Do not handle items unless necessary to move and make safe. If there are nitrile disposable gloves available use them.

It is acknowledged that completion of all of the above tasks may not be possible in a traumatic situation. You are urged to do the best that you can and seek help where possible for the Club's Safeguarding Team.

## Appendix 8 - Capacity

### Capacity

It is not for you as a Grimsby Town Football Club employee / volunteer to make a decision about whether a vulnerable adult lacks capacity, but it is useful for professionals to have an understanding of the notion of capacity explained below.

### Definition

- The ability to make a decision at a particular time, with the starting assumption always being that a person has the capacity to make a decision, unless it can be established that they lack capacity.
- The term “lacks capacity” means a person who lacks capacity to make a particular decision, or take a particular action for themselves at the time when the decision or action needs to be taken. This reflects the fact that some people may be unable to make some decisions for themselves but will have capacity to make other decisions. For example, they may be able to make small decisions about everyday matters such as what to wear, or what to eat but lack capacity to make more complex decisions about financial matters.
- It also reflects that a person who lacks capacity to make a decision at a certain time, may be able to make that decision at a later date - this may be due to illness or accident.

### Assessing Capacity

A person’s capacity must be assessed specifically in terms of their capacity to make a particular decision at the time it needs to be made. Anyone assessing someone’s capacity to make a decision for themselves should use the two-stage test of capacity:

- Does the person have an impairment of the mind, or brain, or is there some sort of disturbance affecting the way their mind or brain works? (It does not matter whether the impairment / disturbance is temporary or permanent).
- If so, does that impairment or disturbance mean that the person is unable to make the decision in question at the time it needs to be made?

### Assessing Ability to Make a Decision

- Does the person have a general understanding of what decision they need to make and why they need to make it?
- Does the person have a general understanding of the likely consequences of making, or not making, this decision?
- Is the person able to understand, retain, use and weigh up the information relevant to this decision?
- Can the person communicate their decision (by talking, using sign language or any other means)? Would the services of a professional (such as a speech and language therapist) be helpful?

### **Assessing Capacity to Make More Complex or Serious Decisions**

- In most instances a doctor or other professional expert will have assessed an vulnerable adult's capacity. Where background information such as this is available, for example from a partner agency, the information should be stored confidentially.
- In most localities an Independent Mental Capacity Advocate (IMCA) is appointed to assist a person who is judged to lack capacity.

### **The statutory principles**

The Mental Capacity Act 2005 sets out five statutory principles:

- A person must be assumed to have capacity unless it is established that they lack capacity.
- A person is not to be treated as unable to make a decision, unless all practical steps to help him/her to do so have been taken without success.
- A person is not to be treated as unable to make a decision, merely because s/he makes an unwise decision.
- An act done or decision made, for or on behalf of a person who lacks capacity must be done, or made, in their best interests.
- Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.



## Appendix 9 - Signs and Symptoms of Abuse

### Signs and Symptoms of Abuse

#### Physical Abuse Indicators:

- Injuries that are not explained satisfactorily.
- Person exhibiting “untypical” self-harm.
- Unexplained bruising to any part of the body, particularly collections of bruises which form a pattern which may correspond to the shape of an object or a person’s hand.
- Unexplained burns especially on “unlikely” areas of the body, soles of the feet or palms of the hands.
- Immersion burns, Rope burns, or burns from an electrical appliance.
- Unexplained fractures to any part of the body.
- Unexplained cuts or scratches to mouth, lips, gums, eyes, or genitalia.
- Medical problems that go unattended.
- Person flinches at physical contact or indicates that someone has threatened them with physical harm.
- Sudden or unexplained urinary or faecal incontinence.
- Reluctance to undress or uncover parts of the body.
- Person may appear afraid of or “anxiously” try to avoid certain members of staff, family members or other people they know.
- Injuries at different stages of healing.
- Unexplained loss of hair in clumps.

#### Sexual Abuse Indicators

- Person discloses fully or partially that sexual abuse is occurring or has occurred in the past.
- Person has urinary tract infections or sexually transmitted diseases that are not otherwise explained.
- Person appears unusually subdued, withdrawn or has poor concentration.
- Person appears reluctant to be alone with a person known to them.
- Person has unusual difficulty in walking or sitting.
- Person experiences pain, itching, or bleeding in genital, or anal area.
- Bruising to thighs, or upper arms.
- Bites on various parts of the body.
- Person exhibits significant change in sexual behaviour or outlook.
- Person’s underclothing is torn, stained, or bloody.
- A woman, who lacks the capacity to consent to sexual intercourse becomes pregnant.

#### Psychological Abuse Indicators

- Untypical ambivalence, deference, passivity, resignation.
- Person appears anxious, withdrawn, or fearful, especially in the presence of specific people.
- Person appears to have a poor opinion of themselves.
- Person appears to lack the opportunity to make choices or have adequate privacy.
- Untypical changes in behaviour, or routines of daily living.
- Person appears isolated and deprived of social contact.
- Person is unable to maintain eye contact having previously been able to.

### **Financial Abuse Indicators**

- General lack of money especially soon after benefits are claimed.
- Person lacks belongings, or services they can clearly afford.
- Inadequately explained fall in living standards.
- Inadequately explained withdrawals from bank accounts.
- Inadequately explained inability to pay bills.
- Person does not appear to possess items which are known to have been purchased.
- Recent acquaintances expressing interest in the person or their money.
- Inadequately maintained financial systems, when a person's money is being managed by others, including a failure to produce receipts for major items.
- Unexplained change in appointee ship or agent.

### **Neglect Indicators**

- Person lives in accommodation which falls below minimum practical standards.
- Person has inadequate heating and / or lighting.
- Person's physical appearance or condition is poor.
- Person appears to be malnourished or dehydrated.
- Person is observed to be left in wet clothing.
- Failure to obtain health services when the person is ill.
- Person does not appear to be taking the prescribed medication.
- Callers / visitors refused access to the person.
- Person is exposed to unacceptable risks.

## **Appendix 10 – Key Government Initiatives and Legislation**

### **Key Government Initiatives and Legislation**

#### **Human Rights Act 1998**

This Act came into force in this country on 2 October 2000. It brings the rights outlined in the European Convention of Human rights into English law for the first time. The Act is designed to protect individuals from abuse by state institutions and people working for these institutions. BILD has developed an easy guide to the Human Rights Act and its implications for people with learning disabilities.

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

#### **Speaking Up For Justice 1998**

This was a report of the Interdepartmental Working Group on the treatment of Vulnerable or Intimidated Witnesses in the Criminal Justice System. The aim of the Working Group was to improve access to justice for vulnerable or intimidated witnesses, including children. It made a total of 78 recommendations for improvements to the criminal justice system including the reporting of crime, identification of vulnerable or intimidated witnesses, and measures to assist witnesses before, during and after the trial. All 78 recommendations were accepted.

#### **Youth Justice and Criminal Evidence Act 1999**

The recommendations from Speaking Up For Justice that required legislative changes were incorporated into this Act.

<https://www.legislation.gov.uk/ukpga/1999/23/contents>

#### **Achieving Best Evidence 2002 / 2006**

‘Achieving Best Evidence in Criminal Proceedings’ offers guidance for vulnerable or intimidated witnesses, including children. It covers the planning and conducting of interviews, witness preparation and support and witnesses in court.

[www.cps.gov.uk](http://www.cps.gov.uk)

#### **Sexual Offences Act 2003**

The Sexual Offences Act introduced a number of new offences concerning vulnerable adults and children.

<https://www.legislation.gov.uk/ukpga/2003/42/contents>

#### **Mental Capacity Act 2005**

Its general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and there should be

least restrictive intervention.

<https://www.legislation.gov.uk/ukpga/2005/9/contents>

### **Safeguarding Vulnerable Groups Act 2006**

The Safeguarding Vulnerable Groups Act introduces the new Vetting and Barring Scheme and will integrate the current List 99 (for people banned from working as teachers), and the Protection of Children Act lists which cover those working in childcare settings. It has also established a new list of people barred from working with vulnerable adults to replace the Protection of Vulnerable Adults list and this is managed by the Independent Safeguarding Authority (ISA).

<https://www.legislation.gov.uk/ukpga/2006/47/contents>

### **Adult safeguarding: statement of government policy 2011**

The purpose of this document is to set out the Government's policy on safeguarding vulnerable adults. It includes a statement of principles for use by Local Authority Social Services and housing, health, the police and other agencies for both developing and assessing the effectiveness of their local safeguarding arrangements.

<https://www.gov.uk/government/organisations/department-of-health-and-social-care>

### **Disclosure & Barring Service 2013**

Criminal record checks: guidance for employers - How employers or organisations can request criminal records checks on potential employees from the Disclosure and Barring Service (DBS).

<https://www.gov.uk/dbs-update-service>

### **The Care Act 2014 – statutory guidance**

The Care Act introduces new responsibilities for local authorities. It also has major implications for adult care and support providers, people who use services, carers and advocates. It replaces No Secrets and puts adult safeguarding on a statutory footing. [www.gov.uk/government/publications/care-act-2014-statutory-guidance-for-implementation](http://www.gov.uk/government/publications/care-act-2014-statutory-guidance-for-implementation)

<https://www.gov.uk/government/publications/care-act-statutory-guidance>

### **Making Safeguarding Personal Guide 2014**

This guide is intended to support councils and their partners to develop outcomes-focused, person-centred safeguarding practice.

<https://www.local.gov.uk/our-support/our-improvement-offer/care-and-health-improvement/making-safeguarding-personal>