

Grimsby Town Football Club

Safeguarding Vulnerable Adults Policy

Policy Reviewed	Sept 2023	Pete MacLeod (Lead Safeguarding Officer)
Next Review date	August 2024	
Policy reviewed		



1. Safeguarding Policy Statement:

Grimsby Town Football Club strives to ensure that everyone in our care or attending our activities feel safe and free from risk of harm. The Club takes its safeguarding responsibilities very seriously and we are committed to creating a safe and positive environment for everyone.

We believe that everyone at the club shares the responsibility for safeguarding children and adults at risk, so our policy and practices are applicable to everyone involved. The staff and partners working with the club will work tirelessly to embed the culture of safeguarding across every aspect of the club and its activities. We are committed to having the right people involved through a robust recruitment process that includes checks, training, and monitoring.

The Club complies with government legislation relating to safeguarding children and other adults at risk. We also adhere to our regulatory requirements set by the Football Association, EFL and North East Lincolnshire Council Safeguarding Partnership guidelines.

We will develop and implement effective policy, appropriate procedures and good practice in order to protect all children and adults at risk who attend the Club's activities. Our safeguarding policy is a comprehensive resource that provides information on how good practice is embedded and promoted across club activities.

2. Introduction

The safety and welfare of adults at risk under the care of the Grimsby Town FC is paramount. All participants and visitors to club activities have a right to feel safe and be safe. All members of staff have a duty to keep Adults at Risk safe and help protect them from abuse or harm in accordance with the Care Act 2014.

All adults at risk that engage with the club, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to feel safe and protected from abuse, exploitation and poor practice, and have their welfare promoted.

All suspicions, reports and/or allegations of abuse will be taken seriously & investigated thoroughly which may involve the appropriate local authority teams where necessary.

Grimsby Town Football Club acknowledges its duty of care to safeguard and promote the welfare of adults at risk, and is committed to ensuring safeguarding practice reflects statutory requirements and responsibilities, government guidance, recognised best practice and complies with EFL rules.

The club expects all staff, players, volunteers, partners, contractors and guests to share this commitment. The club commits to employing a Lead Designated Safeguarding Officer who implements, maintains and monitors best practice across the club.



This safeguarding policy is applicable to the season 2023/2024 and will be monitored and reviewed a minimum of once a year, or whenever there is a change in legislation, organisational change or following any learning

outcomes or serious case reviews from safeguarding incidents, concerns or allegations. Any review and change in policy will be conducted in consultation with the Local safeguarding adult's board.

3. The six principles of adult safeguarding

The Care Act 2014 sets out the following principles that should underpin safeguarding of adults :

Empowerment - People being supported and encouraged to make their own decisions and informed consent.

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

Prevention - It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

Proportionality - The least intrusive response appropriate to the risk presented. "I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."

Protection - Support and representation for those in greatest need.

"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

Partnership - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."

Accountability - Accountability and transparency in delivering safeguarding. "I understand the role of everyone involved in my life and so do they."

4. Making Safeguarding personal

'Making safeguarding personal' means that adult safeguarding should be person led and outcome focussed. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control. As well as improving quality of life, well-being and safety.



Wherever possible discuss safeguarding concerns with the adult to get their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of the organisation where necessary.

Wellbeing Principle

The concept of wellbeing is threaded throughout the Care Act and it is one that is relevant to adult safeguarding in sport and activity. Wellbeing is different for each of us however the Act sets out broad categories that contribute to our sense of wellbeing. By keeping these themes in mind, we can all ensure that adult participants can take part in/or support football fully.

- Personal dignity (including treatment of the individual with respect)
- Physical and mental health and emotional wellbeing
- Protection from abuse and neglect
- Control by the individual over their day-to-day life (including over care and support provided and the way they are provided)
- Participation in work, education, training or recreation
- Social and economic wellbeing
- Domestic, family and personal domains
- Suitability of the individual's living accommodation
- The individual's contribution to society.

5. Legislation

The practices and procedures within this policy are based on the principles contained within the UK legislation and Government Guidance and have been developed to complement the Safeguarding Adults Boards policy and procedures They take the following into consideration:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 1998

6. KEY SAFEGUARDING TERMINOLOGY AND DEFINITIONS

Key Safeguarding Terminology and Definitions:

Adult is anyone aged 18 or over.



Adult at Risk is a person aged 18 or over who:

Has needs for care and support (whether or not the local authority is meeting any of those needs); and;

Is experiencing, or is 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.

Adult in need of care and support is determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors. Naturally, a person's disability or frailty does not mean that they will inevitably experience harm or abuse.

In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental and clinical factors, not merely because they may be defined by one or more of the above descriptors.

In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse.

Abuse is a violation of an individual's human and civil rights by another person or persons. See section 4 for further explanations.

Adult safeguarding is protecting a person's right to live in safety, free from abuse and neglect.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).

The Club – refers to Grimsby Town Football Club (GTFC), its staff and all activities it undertakes. In certain circumstances, it may also refer to third parties with an entrusted responsibility for delivering club-supported activity.

The Trust – refers to GTSET in the Community, its staff and all activities it undertakes. In certain circumstances, it may also refer to third parties with an entrusted responsibility for delivering club-supported activity

The Academy – refers to the standalone Academy department within the club which is responsible for nurturing and developing the club's future generations of players. The Academy is based at an independent site external to the club's ground. It is also the location of the Club's training ground.

Staff – refers to persons employed by and receiving payment for services from the Club or Trust. This is irrespective of the length or nature of their contract.



Volunteers – persons who freely offer their skills and expertise or take part in a task, event or enterprise with the club or charity at their own expense in terms of time and/or resources.

Child – Defined in the Children's act (1989) as any person under the age of 18.

Safeguarding – Preventative and reactional measures taken by the Club and Charity to ensure; the risk of harm or mistreatment to the welfare of Vulnerable Groups is minimised; the health or wellbeing of Vulnerable groups is not impaired when engaging in Club or Charity related activities; an environment exists that allows Vulnerable groups to be cared for safely and allows for the best possible outcomes for them and provides them with the best life chances possible.

Welfare – The health, happiness and fortunes of an individual and the humanitarian aspects of their life including personal need and physical and mental development.

Rules, Regulations and Guidance - The Club is governed by the legislation and rules/ regulations set out by several key governing agencies including the Government, Football Association and EFL.

7. Review

This policy will be reviewed annually or if there is a statutory legislative or organisational change, or following a safeguarding incident, concern, or allegation whereby the policy is found to need revision to ensure the aims and key principles are met. All policy documents and reviews will be submitted to the Board for approval.

8. Aims and Key Principles

The aims of the GTFC's Safeguarding Adults Policy are:

- To safeguard all vulnerable adults who interact with the GTFC through its Football and Development Programme and its Academy.
- To demonstrate best practice in safeguarding adults.
- To positively reflect and promote GTFC values regarding safeguarding.
- To develop a positive and pro-active welfare programme to enable all vulnerable adults to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout GTFC and its Academy programme.

9. Lead Safeguarding Officer

The Designated Lead Safeguarding Officer has overall responsibility for the safeguarding of children and vulnerable adults at GTFC. The Designated Safeguarding Officer Pete MacLeod will.



- Report to the Board on recommendations for changes to the Safeguarding Policy and Procedures considering legislative changes.
- Make the decision to investigate any allegations or concerns of abuse.
- Address any immediate protection issues.
- Make the decision to refer to an appropriate agency (FA, EFL, Police or Social Services).
- Ensure the Board of Directors and staff are trained on GTFC safeguarding procedures.
- Ensure they undertake regular and appropriate training for the role.
- Source appropriate external training for safeguarding.
- Undertake regular monitoring and risk assessments of activities involving children (or will designate this task to a trained activity lead, the Safety & Stadium Operations manager, or an external assessor as appropriate).
- The Lead Safeguarding Officer (LSO) for the Club is Pete MacLeod.
- The Academy Safeguarding Officer is Oliver Cowling
- Our player care officer is Kris Hoskins
- David White Stadium Operations Manager is responsible for match day safeguarding.

The Senior Safeguarding Manager (SSM) for the club is Debbie Cook – Chief Executive

Anybody with a concern about a child or young person's welfare should contact the SSM or LSO direct, or their line Manager for advice in the first instance. Contact details can be found at the end of this policy.

All employees, contractors and volunteers are expected to.

- Be alert to signs of abuse and radicalisation and take responsibility for referring concerns to the SSM or Designated Safeguarding Officer.
- Be prepared to listen to and take seriously concerns or allegations.
- Abide by the codes of conduct for employees, coaches and volunteers.
- Promote the health, safety, and welfare of children.
- Maintain records, as necessary.
- Set a good example by their own behaviour.

The Lead Safeguarding Officer should:

- ensure all policies are used appropriately:
- Ensure the club's Safeguarding policy is reviewed annually and the procedures and their implementation are updated and reviewed regularly. • Ensure the Safeguarding policy is on the club's website.
- Link with the Local Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- The Safeguarding Poster, stating the name of the Designated Safeguarding Leads, must be clearly displayed in the Club and Academy.



10. Human Resources and Disclosures Recruitment

As part of GTFC's safer recruitment and selection process, offers of work for positions which involve working with children are subject to a satisfactory Disclosure & Barring Service (DBS) Criminal Records Check (CRC) at the level deemed suitable for the position offered and subject to appropriate references. GTFC follows 'safer recruitment' guidance in the employment of its new staff.

11. Safeguarding Training & Awareness

This policy and procedure are issued to all GTFC employees and casual workers who meet children at induction and is also available to all employees on the staff Intranet and members of the public through the GTFC website. The DSO holds a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters, and volunteers during which the key elements of the GTFC Safeguarding Children Policy are discussed in more detail and specifically to the individuals' role. All staff working in direct contact with children are required to complete the FA's, 3hour Safeguarding Children Awareness workshop and undertake a refresher course, as advised by the FA, at least once every 3 years. Details of training and qualifications is retained in the staff member's personal file.

Safeguarding Awareness courses are also offered by the Club to develop knowledge which are department specific.

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.

12. Service Level Agreements / Partnership Agreements

The Club's commitment to Safeguarding is outlined in any partnership agreements, its service level agreement with the Grimsby Town Sports and Education Trust or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children.

13. Lone Working Guidance

Working one to one should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Designated Safeguarding Officer for the Academy.

14. Highlighting Concern

Although GTFC is committed to doing the utmost to safeguard children from harm there may be occasions when concern is raised over the treatment of a child. "Child abuse" and "neglect" are generic terms encompassing all ill treatment of children as well as cases where the standard of care does not



adequately support the child's health or development. Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse children, but this is simply not the case – abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

To provide staff and volunteers with the overarching principles which guide our approach to safeguarding? Grimsby Town Football Club believes that a child or young person should never experience abuse of any kind. We have a moral and legal responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to this practice in a way that protects them by responding to the 5 R's of safeguarding children.

- **Recognise** - Signs and symptoms of abuse.
- **Respond** - An allegation from a child or vulnerable adult against a member of staff/volunteer, a disclosure from a child or vulnerable adult, suspicions regarding the conduct of other staff members or concerns from a staff member.
- **Report** - To designate safeguarding lead, it is their responsibility to make further decisions.
- **Record** - Exactly what has happened using the words said? This information should be signed, dated, and kept in a secure place as agreed within your safeguarding policy.
- **Refer** - This will be the role of the Designated Safeguarding Manager who will make all further decisions. The only agencies that can investigate child protection cases are the Police and the Multiagency safeguarding hub of the Local Authority.

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 Lead Safeguarding Officer. Pete Macleod

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

Single Point of Contact: 01472 326118 LADO

Integrated Front Door: 01472 326292 (Option 2)

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

LADO: 01472 - 326118 Email: lado@nelincs.gov.uk

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

15. Whistle Blowing

Whistleblowing in a safeguarding context means revealing and raising concerns over misconduct or malpractice within an organisation, or within an independent structure associated with it. It can be used as an early-warning system or when it is recognised that appropriate actions have not been taken. This approach or policy is adopted in many different walks of life.

Both GTFC and its associated Community Trust (GTSET) have applicable 'Whistleblowing' policies and procedures.

Any adult or young person with concerns about a colleague's conduct towards a child or young person can also use whistleblowing by calling 0800 169 1863 and asking for The FA's safeguarding team, or via email to: safeguarding@TheFA.com.

16. Definitions of Poor Practice and Abuse

Poor Practice is unacceptable and will be treated seriously with appropriate action. Any



behaviour that contravenes existing Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care is an indication of Poor Practice. An adult at risk may not be aware that poor practice or abusive is taking place, as they may deem the behaviour as acceptable

What is abuse?

Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of a single act or repeated acts. It may be physical, financial, verbal or psychological or an act of neglect or omission to act. It may occur when an adult at risk is persuaded to enter into a financial or sexual transaction to which s/he has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Types of Abuse and Neglect

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern:

Self-neglect – this covers a wide range of behaviour: neglecting to care for one's Personal hygiene, health or surroundings and includes behaviour such as hoarding. Modern Slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Domestic Abuse and coercive control – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members.

Discriminatory Abuse – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

Organisational Abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Physical Abuse – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

Sexual



Abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Financial or Material Abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Indicators of financial abuse include:

- Change in living conditions
- Possessions sold
- Inability to pay bills/unexplained shortage of money
- Unexplained withdrawals from an account
- Unexplained loss/misplacement of financial documents
- Isolation from family/friends/social network
- Carer's enhanced lifestyle
- Sudden changes in bank account or banking practice
- Unauthorised withdrawal of funds using the vulnerable person's ATM card, or changes in patterns of usage.
- Sudden or unexpected changes in a will or other financial documents.

The above are illustrations of potential indicators of abuse. It does not mean that it is proof of actual abuse but may require further scrutiny. It is not an exhaustive list.

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

Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Not included in the Care Act 2014 but also relevant:

Cyber Bullying – cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.



Forced Marriage – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry. The forced marriage of adults with learning disabilities occurs when the adult does not have the capacity to consent to the marriage.

Mate Crime – a ‘mate crime’ as defined by the Safety Net Project as ‘when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.’ Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Radicalisation – the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

Remember: It is not the responsibility of staff (permanent or casual) or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns, in accordance with this procedure.

The Care Act 2014

The Care Act came into force in April 2015 and places further obligations upon statutory agencies relating to care and support for adults and the law relating to support for carers; to make provision about safeguarding adults from abuse or neglect; to make provision about care standards; to establish and make provision about Health Education England; to establish and make provision about the Health Research Authority; to make provision about integrating care and support with health services; and for connected purposes.

The Mental Capacity Act 2005

The Mental Capacity Act 2005 provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves and establishes a framework for making decisions on their behalf. This applies whether the decisions are life-changing events or everyday matters. All decisions taken in the safeguarding process must comply with the Act.

The Act says that: “...a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain.”



The presumption is that adults have mental capacity to make informed choices about their own safety and how they live their lives

All interventions need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take. It is not for Nottingham Forest Football Club staff or volunteers to make a decision about whether an adult at risk lacks capacity, but it is useful for professionals to have an understanding of the notion of capacity as explained below.

Definition

Capacity is the ability to make a decision at a particular time. The starting assumption must always be 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 judgement or understanding to make a particular decision or take a particular action for them 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. I.E 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.

Consent Issues

If concerns arise consent must be obtained from the individual concerned before a referral is made to Adult Services or the police. However, if others are at risk of harm the information should be passed to Adult Services or the police even if consent is not obtained. Information about an individual should not be given to family or carers without consent of the individual. If concerns arise and the individual is unable to give consent to information sharing a referral should be made to statutory agencies. Family/carers should only be informed if this does not place the person concerned at risk of harm. Staff should seek guidance from the SSM if they are unsure.

Signs and indicators of abuse and neglect

Abuse can take place in any context and by all manner of perpetrator. Abuse may be inflicted by anyone in the club who an athlete comes into contact with. Or club members, workers, volunteers or coaches may suspect that an athlete is being abused or neglected outside of the club setting. There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.



- Person is not attending / no longer enjoying their sessions. you may notice that A participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.
- Someone losing or gaining weight / an unkempt appearance. this could be a player whose appearance becomes unkempt, does not wear suitable sports kit and deterioration in hygiene.
- A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions, in contrast to their personal assistant whom they greet with a smile.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e. a disclosure.
- Harassing of a club member because they are or are perceived to have protected characteristics.
- Not meeting the needs of the participant, eg this could be training without a necessary break.
- A coach intentionally striking an athlete.
- This could be a fellow athlete who sends unwanted sexually explicit text messages to a learning disabled adult they are training alongside.
- This could be an athlete threatening another athlete with physical harm and persistently blaming them for poor performance.

17. Good Practice

All GTFC employees, workers, agency staff and volunteers working with children, young people should adhere to the following principles and action (list is not exhaustive):

- Always work in an open environment (e.g., avoiding private or unobserved situations and encouraging open communication with no secrets).
- Make the experience of the sporting activity fun and enjoyable: promote fairness, confront, and deal with bullying.
- Treat all children and young people equally and with respect and dignity.
- Always put the welfare of the child or young person first. For example in adverse weather conditions of cold or heat. If the weather is cold or wet ensure that the children have adequate and suitable warm clothing to wear for outside activities or travelling to and from activity venues. Likewise in warm or excessively hot weather that children are suitably clothed, frequent breaks are given for drinks and fluid whether indoors or outside. If outside that they are protected from potential harm from the sun by application of protective creams.

‘IT MUST BE NOTED THAT COACHES WILL NOT PHYSICALLY APPLY SUN PROTECTIVE CREAMS TO CHILDREN AND YOUNG PEOPLE BUT CAN ENSURE THAT THE CHILD OR YOUNG PERSON APPLIES IT TO THEMSELVES.’



- Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact.
- Where any form of manual/physical support is required, it should be provided openly and with the consent of the child or young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child or young person's consent has been given.
- If groups must be supervised in changing rooms always ensure coaches work in pairs.
- Request written parental consent if Club officials are required to transport children and young people.
- Gain written parental consent for any significant travel arrangements e.g., overnight stays. Coaches are qualified and a qualified first aider, is in attendance.
- Ensure that at away events adults should not enter a child or young person's room or invite children and young people to their rooms.
- Be a good role model, this includes not smoking or drinking alcohol in the company of children and young people.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure written parental consent for the Club to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises.
- Keep a written record of any injury that occurs, along with details of any treatment given.
- All other good practice/common sense principles given the varying situations.

18. Responding to a Report or Suspicion

A Designated Safeguarding Officer or the Safeguarding Senior Manager should be contacted as early as possible and within 24 hours in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. The following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice.

Do:

- Ensure the child or young person's safety.
- Always treat any allegations extremely seriously and act towards the child as if you believe what they are saying, although do not directly say the words "I believe you".
- Tell the child they are right to tell you.
- Reassure the child that they are not to blame.
- Be honest about your own position, who you must tell and why.
- Tell the child what you are doing and when and keep them up to date with what is happening.
- Take further action – you may be the only person in a position to prevent future abuse.
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident

Report Form should be used where possible and, in any case, a referral must be made to the Club within 24 hours of the incident taking place.

- Seek medical advice if necessary.



Do not:

- Make promises you cannot keep or to keep secrets.
- Interrogate the child – it is not your job to carry out an investigation – this will be up to the Police and Children's Services who have experience in this.
- Cast doubt on what the child has told you, do not interrupt or change the subject.
- Say anything that makes the child feel responsible for the abuse.
- Inform parents/carers – the Safeguarding Senior Manager or Academy Designated Officer will make this decision based on whether there is suspicion of their involvement.

"DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT."

Make sure you tell the Designated Safeguarding Officer immediately, they will know how to follow this up and where to go for further advice.

Role of the Safeguarding Lead

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 24/4, 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 Grimsby Town 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.



19. Recording Allegations or Suspicions

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.

The Club will ensure that any child concerned is immediately removed from any possible risk of harm. Investigations into possible abuse will require careful management. In these cases, the Designated Safeguarding Officer or Safeguarding Senior Manager will first seek the advice of the Local Authority Designated Officer (LADO), the Police, or the Football Association Safeguarding Team, before setting up an internal inquiry and take their advice on informing the child's parents.

In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the club must provide a report to the FA Head of Safeguarding and inform the Club's Senior Safeguarding Manager on the Board of Directors and the Chief Executive Officer. Any external local authority provision will naturally take the lead on any case.

Providing it is appropriate to do so the Safeguarding Senior Manager will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency. Escalation to inform Board level will take place at the Safeguarding Senior Manager's earliest opportunity.

20. Specific information regarding allegations against members of staff

If the report involves an allegation about any member of the GTFC staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and the Club believes that the report could demonstrate that the member of staff in question has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she is unsuitable to work with children, then the Safeguarding Senior Manager or Designated Safeguarding Officer shall immediately inform the Local Authority Designated Officer (LADO) where the alleged incident took place so that he or she can consult with the Police and Local Authority Children's Social Care colleagues as appropriate.

Where the Safeguarding Senior Manager or Designated Safeguarding Officers are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. The member of staff in question will be asked to stay



away from activities pending the conclusion of any investigation. This process would only be carried out once the advice of the above-mentioned external bodies had been sought and only then in consultation with the Safeguarding Senior Manager or Designated Safeguarding Officer.

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 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.

21. Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff at the Club is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents / carers must be told).

A child 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 and any marks raising concern should be recorded on the incident and report form.

There are actions which staff must and 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. A matter is confidential on a need-to-know basis, and nobody should have any reservations about referring any issue to the Safeguarding Senior Manager or any Designated Safeguarding Officer. The key issue is that the welfare of the child is protected.



22. Related Policies and Documents:

Grimsby Town Football Club will also have in place the following policies, related to this policy, they are being.

- Vulnerable Adult Policy
- Equality and Diversity Policy
- Prevent Policy
- E – Technology Policy
- Anti-Bullying Policy
- Safer Recruitment Policy
- Code of Conduct for Manager(s) Coaches Code of Conduct for Players. Code of Ethics for Coaches Complaints and Appeals

Who can I contact?

Pete MacLeod, Designated Safeguarding Officer	07498926776 – pete@gtfc.co.uk
Oliver Cowling, Academy Safeguarding Officer	07855520953 – oliver@gtfc.co.uk
NEL Local Authority Safeguarding Officer	01472 - 326118
Lincolnshire County FA DSO	01522-596583 Mob:07973666778 Sarah.pridmore@lincolnshiefafa.com
FA/NSPCC Safeguarding	0808 500 5000 (24 hrs)
FA Safeguarding Management Team	080016918630 #6300

Additional Key Contacts

North East Lincolnshire Safeguarding Childrens Board www.safernel.co.uk

- Local authority children's social care team **01472 326292 (option 2)**
- Local authority Designated Officer (LADO) **01472 326118**
- Local Authority referral team **01472 326292**
- Local Authority Out of Hours Team **01472 326292 (option 2)**
- Local Safeguarding Children Partnership **01472 326292 (option 2)**
- Local Early Help services **01472 326292 (option 2)**
- NSPCC **0808 800 5000**
- Ofsted **0300 123 1231**
- Emergency police **999**
- Non-emergency police **101**
- Government helpline for extremism concerns **020 7340 7264**
- Local authority PREVENT duty officer **Prevent@humberside.pnn.police.uk**
- Child exploitation and Online protection command (CEOP)
<https://www.ceop.police.uk/safetycentre/>



North East Lincs advice for staff or volunteer- [LADO-Dealing-with-Allegations-Guidance-supportingstaff-and-volunteers-CA-Dec-20.pdf \(safernel.co.uk\)](#)

North East Lincs LADO information- [LADO-Guidance-for-Teachers-other-staff-dealing-withallegations-against-education-staff-CA-Dec20.pdf \(safernel.co.uk\)](#)

North East Lincs Lado information for dealing with allegations- [LADO-Dealing-with-Allegations-MASHCASS-CA-Dec20.pdf \(safernel.co.uk\)](#)

Monitoring and review

The club Lead Safeguarding Officer will meet monthly to report to the Senior Safeguarding Manager any issues or concerns and will be monitored on compliance with the EFL Safeguarding Standards

The Board of Directors for Grimsby Town Football Club approved the contents of this policy which will be reviewed annually, or sooner due to changes in legislation or lessons learned from any public enquiry into safeguarding issues.

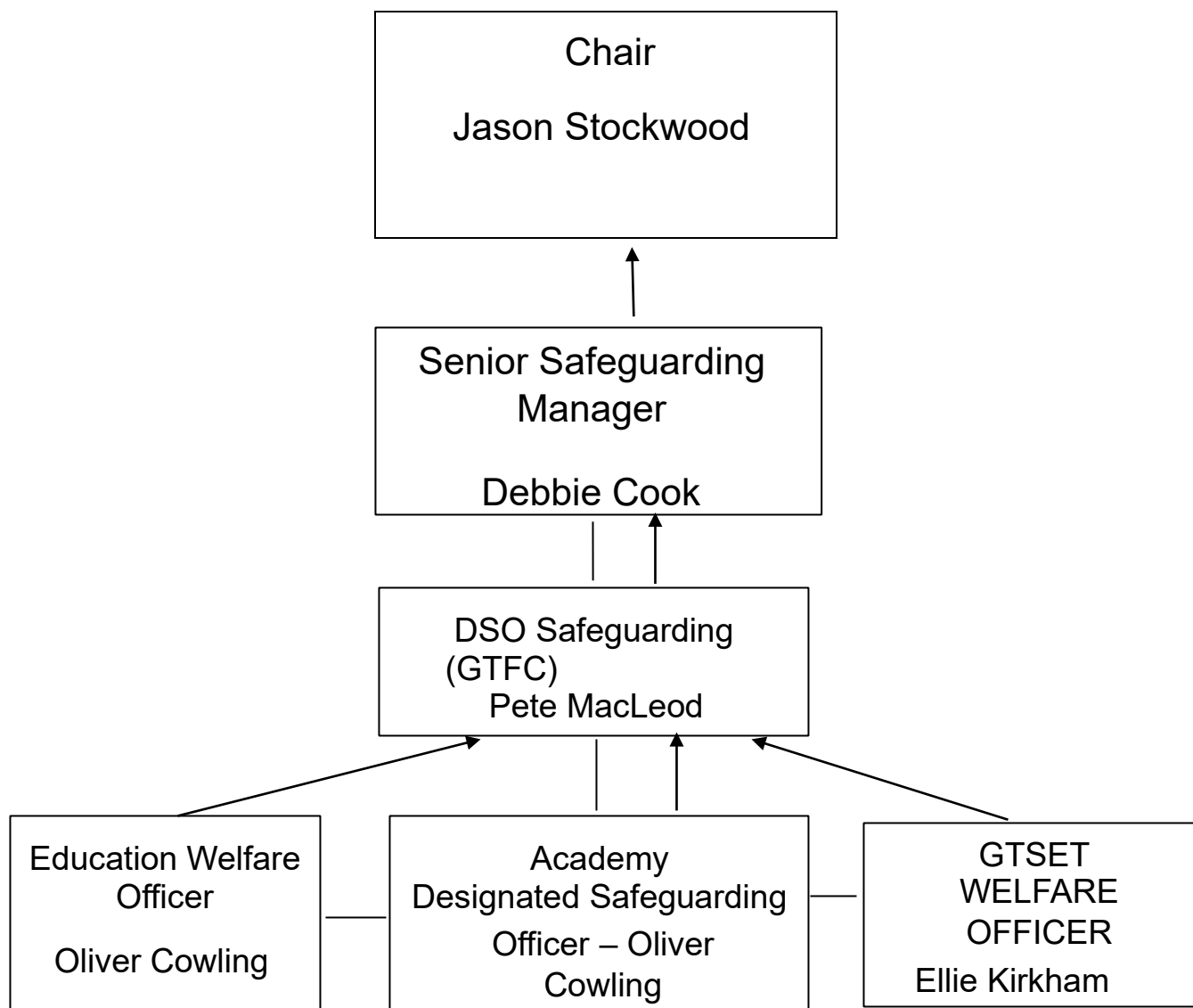
Signed:
(Chair of Board of Directors)

Dated:

Signed:
(Designated Safeguarding Lead)

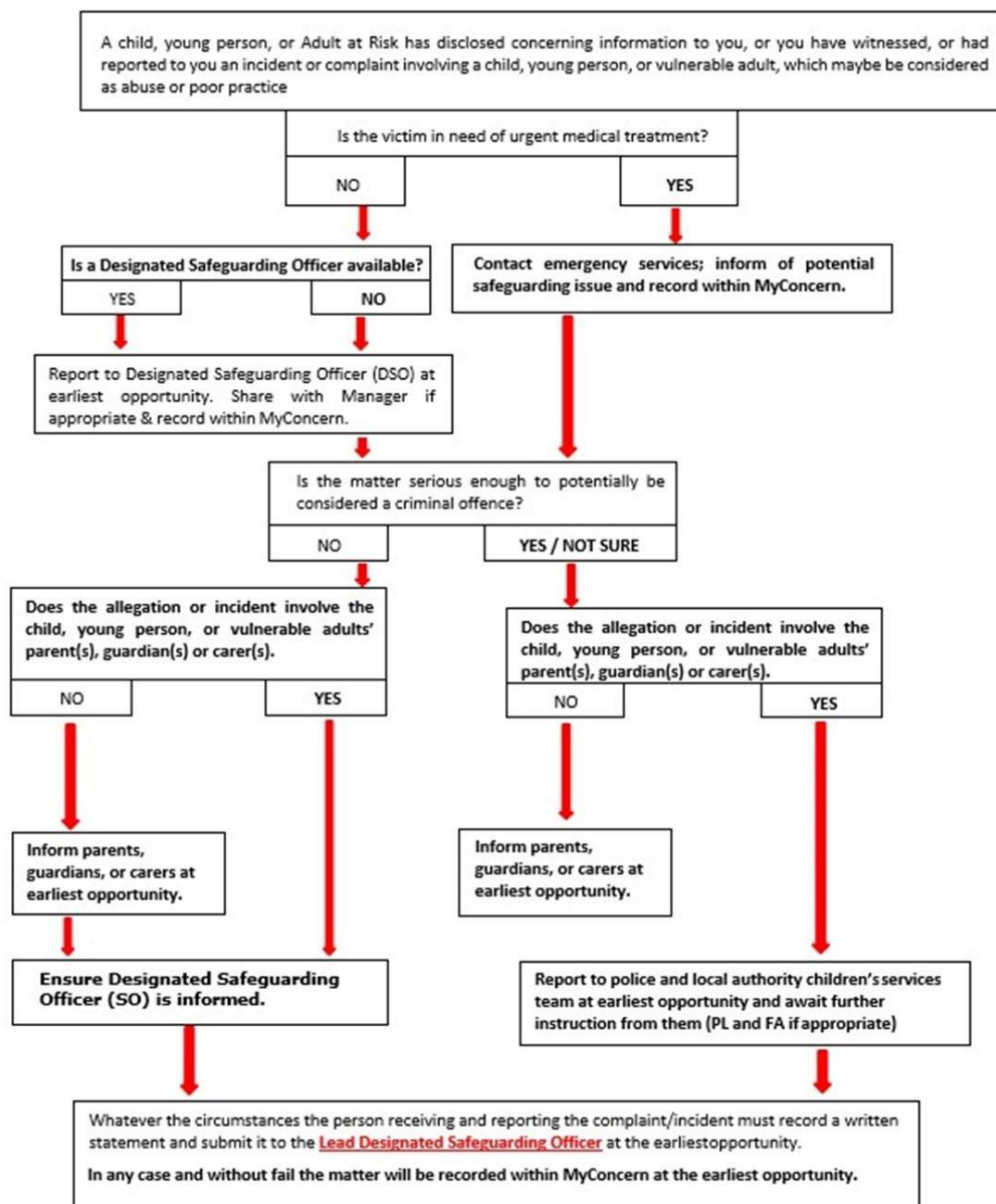
Dated:

Appendix 1 Safeguarding Accountability Chart





Reporting Flow Chart





Version Control

Date	Ammendments	By Whom
21/01/2021	Full policy review to update recent legislation and recommendations in relation to FA/EFL safeguarding practices and recommendations from the Sheldon Report into Abuse in Football.	Martin George
21/02/21	Policy Update	Martin George
26/09	Policy Update Changes in line with protocol upon review	Pete MacLeod
05/01/23	Amendments in line with new branding guidelines	Pete MacLeod