



Grimsby Town Football Club, Academy and Foundation
Safeguarding Adults Policy

Version:	5
Author Name and E-mail:	Vikki Harries vikki@gtfc.co.uk
Co-Author Name and Email	
Approval/Ratification body	Board Committee
Review Frequency	Annually
Date Reviewed/ratified:	August 2026
Subsequent Review date:	August 2027

Contents

Safeguarding Policy Statement	4
Introduction.....	4
The six principles of adult safeguarding	5
Making Safeguarding personal	5
Wellbeing Principle	6
Legislation	6
Key Safeguarding Terminology and Definitions:	7
Review	8
Key roles.....	8
The Safeguarding manager	8
Key Safeguarding staff	9
The Senior Safeguarding Manager (SSM)	9
Human Resources and Disclosures Recruitment	10
Safeguarding Training & Awareness	10
Service Level Agreements / Partnership Agreements	10
Lone Working Guidance.....	11
Highlighting Concern	11
What is a Low-Level Concern?	12
Two Examples of Low-level Concerns:	12
Whistle Blowing	13
Definitions of Poor Practice and Abuse	13
What is abuse?	13
Types of Abuse and Neglect	13
Sexual	14
The Act's	16
Consent Issues	17
Signs and indicators of abuse and neglect	17
Good Practice	17
Responding to a Report or Suspicion	18
Role of the Safeguarding Lead	19
Recording Allegations or Suspicions	20
Allegations against members of staff	20
Where may harm occur?	21
Confidentiality	21
Related Policies and Documents:	22

Adult Designated Safeguarding Manager22

 Contact details22

Who can I contact?22

Additional Key Contacts23

Monitoring and review23



Safeguarding Policy Statement

Grimsby Town Football Club (GTFC) and Grimsby Town Foundation (GTF) strive to ensure that everyone in our care or attending our activities feels safe and free from risk of harm. GTFC and GTF take 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.

GTFC and GTF comply 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 Northeast Lincolnshire Council Safeguarding Partnership guidelines.

We will develop and implement effective policy, appropriate procedures and good practice 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.

Introduction

The safety and welfare of adults at risk under the care of the GTFC and GTF 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.

GTFC and GTF acknowledge 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.

GTFC and GTF expects all staff, players, volunteers, partners, contractors and guests to share this commitment. The Club and Foundation commit to employing a

Safeguarding Manager who implements, maintains and monitors best practice across the Club.

The six principles of adult safeguarding

- The Care Act 2014
- The Domestic Abuse Act 2021 - which broadens the definition of domestic abuse to include coercive and controlling behaviour and recognises 'personally connected' individuals regardless of gender or setting. 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 act 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 can 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."

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 by **Making Safeguarding Personal (MSP)**. This means that adult safeguarding is person-led and outcome-focused. It involves engaging the adult in meaningful conversations about how best to respond to their safeguarding concerns, in a way that enhances their involvement, choice and control, while promoting their wellbeing, safety and quality of life. Safeguarding concerns should be discussed with the adult to understand their views, wishes and desired outcomes. The adult should remain involved throughout the safeguarding process, and their consent should be sought before sharing information outside the organisation, unless there is a legal or safeguarding reason to do otherwise.

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

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 Domestic Abuse Act 2021 - which broadens the definition of domestic abuse to include coercive and controlling behaviour and recognises 'personally connected' individuals regardless of gender or setting.
- 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
- Data Protection Act 2018 and UK GDPR

Key Safeguarding Terminology and Definitions:

Adult is anyone aged 18 or over.

Adult at Risk - An adult aged 18 years or over who:

- Has needs for care and support (whether or not those needs are being met by the local authority);
- Is experiencing, or is at risk of, abuse or neglect; and
- As a result of those care and support needs, is unable to protect themselves from the abuse or neglect, or the risk of it.

Adult with Care and Support Needs - An adult whose need for care and support arises from physical or mental ill health, disability, age, illness, substance misuse or other circumstances affecting their wellbeing. Having care and support needs does not automatically mean that a person is at risk of abuse or neglect. The likelihood of harm should be assessed by considering a range of personal, social, environmental and clinical factors. Current safeguarding practice has moved away from the use of the term '*vulnerable adult*' in favour of '*adult with care and support needs*' or '*adult at risk*'.

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 - The ability to make a specific decision at the time it needs to be made. Under the Mental Capacity Act 2005, a person must be assumed to have capacity unless it is established that they lack capacity. Capacity may fluctuate and should be assessed in relation to the particular decision that needs to be made.

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 Foundation - refers to Grimsby Town Foundation (GTF) 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 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 Foundation. 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.

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.

Aims and Key Principles

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

- To safeguard all vulnerable adults who interact with GTFC, GTF and the Academy
- To demonstrate best practice in safeguarding adults.
- To positively reflect and promote GTFC and GTF's 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 GTF's and its Academy programme.

Key roles

The Safeguarding manager

The Safeguarding Manager has overall responsibility for the safeguarding of children and vulnerable adults at GTFC and GTF.

The Safeguarding Manager 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 (LADO, FA, EFL, Police or Social Services, Designated Adult Safeguarding Manager (DASM) process for managing concerns about People in Positions of Trust (PiPoT)
A PiPoT concern relates to someone who works (paid or unpaid) with adults who have care and support needs and where their behaviour indicates they may pose a risk to those adults. This mirrors the role of the LADO process for children.
- Ensure the Board of Directors and staff are trained on GTFC and GTF's 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)

Key Safeguarding staff

- Safeguarding Manager Officer for the Club is Vikki Harries
- The Academy Safeguarding Officer is Oliver Cowling
- The Academy Player Care Officer is Kris Hoskins
- The Head of Facilities and Safety is Dave White who is responsible for match day safeguarding

The Senior Safeguarding Manager (SSM)

The SSM for the Club is Adam Smith.

Anybody with a concern about an adult at risk's welfare should contact the SSM or LDSO 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 Safeguarding Manager
- 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 adults
- Maintain records, as necessary
- Set a good example by their own behaviour

The SSM 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 Safeguarding Manager and match day safeguarding steward, must be clearly displayed in the Club and Academy

Human Resources and Disclosures Recruitment

As part of GTFC's and GTF'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 and GTF follow 'safer recruitment' guidance in the employment of its new staff.

Safeguarding Training & Awareness

This policy and procedures are issued to all GTFC and GTF employees and casual workers at induction and are also available to all employees and members of the public through the GTFC and GTF website. All new staff/ placement students and volunteers will receive an induction appropriate to their role and be enrolled to the right level of safeguarding training.

All staff working in direct contact with vulnerable adults are required to complete The FA's, 3-hour Safeguarding Awareness workshop and undertake a refresher course, as advised by The FA, at least once every 3 years. Details of training and qualifications are retained in the staff member's personal file. Other courses such as High Speed Safeguarding awareness and externally delivered safeguarding courses are also offered by the Club to develop knowledge which are department specific.

Service Level Agreements / Partnership Agreements

The Club's and Foundation's commitment to Safeguarding is outlined in any partnership agreements and the service level agreement.

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 Safeguarding Manager or Safeguarding officer for the Academy.

Highlighting Concern

Although GTFC and GTF are committed to doing the utmost to safeguard adults at risk from harm, there may be occasions when concerns are raised regarding the treatment or wellbeing of an adult. Abuse and neglect are broad terms that encompass all forms of ill treatment, as well as situations where the standard of care does not adequately support an individual's health, wellbeing, independence or dignity

Adults at risk may experience abuse or neglect through the infliction of harm or through a failure to act to prevent harm. Abuse can occur in a family, institutional or community setting. The perpetrator may or may not be known to the individual and may be of the same or opposite sex.

There is often a common misconception that only certain types of people abuse adults at risk; however, abuse can occur in any setting and may be perpetrated by people of any sex, sexual orientation, age, background or relationship to the individual.

To provide staff and volunteers with the overarching principles that guide our approach to safeguarding, GTFC and GTF believe that every adult at risk has the right to live free from abuse, neglect and exploitation. We have a moral and legal responsibility to promote their wellbeing, protect their rights and enable them to live safely. We are committed to achieving this by responding in accordance with the 5 Rs of safeguarding:

Recognise - Identify the signs and indicators of abuse, neglect or exploitation.

Respond - Take all disclosures, allegations and concerns seriously. This may include concerns raised directly by an adult at risk, observations regarding the conduct of staff or volunteers, or concerns reported by others.

Report - Inform the Safeguarding Manager, who is responsible for assessing the concern and determining the appropriate course of action.

Record - Accurately document what has happened, including the exact words used wherever possible. Records should be signed, dated and stored securely in accordance with safeguarding policies and data protection requirements.

Refer - The Safeguarding Manager will make any necessary referrals. Adult safeguarding concerns may be referred to the local authority Adult Safeguarding Team, the Police, health professionals or other appropriate agencies, depending on the nature and level of risk.

GTFC and GTF recognise that safeguarding adults is everyone's responsibility and that concerns should always be raised promptly to ensure that adults at risk are protected and supported.

Low-Level Concerns:

All staff are encouraged to report low-level concern behaviours that do not meet the harm threshold but may indicate a pattern of inappropriate conduct. These must be reported to the Safeguarding Manager and will be recorded and monitored accordingly. Please see the separate Low-Level Concern policy which can be found on the club's website.

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 electronic Safeguarding management system and titled 'Low Level Concern'.

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 Safeguarding Manager.

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

Stewart Watson (Designated Adult Safeguarding Manager)

North East Lincolnshire Council.

Normal Working Hours - Monday to Thursday

3 Town Hall Square, Grimsby, DN31 1HX

Mobile: 07736 195008

Stewart.Watson@nelincs.gov.uk

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

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 GTF have an applicable 'Whistle blowing' policy and procedure.

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

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 Domestic Abuse Act 2021 - which broadens the definition of domestic abuse to include coercive and controlling behaviour and recognises 'personally connected' individuals regardless of gender or setting. 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 covers a wide range of behaviour, including neglecting personal hygiene, health or surroundings, and may include behaviours such as hoarding.

Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude. Perpetrators use coercion, deception, threats and force to exploit individuals and subject them to abuse, servitude and inhumane treatment.

Domestic abuse includes psychological, physical, sexual, financial and emotional abuse, as well as coercive or controlling behaviour. It also includes so-called honour-based abuse. Under the Domestic Abuse Act 2021, domestic abuse occurs between people aged 16 or over who are personally connected.

Discriminatory abuse is harassment, slurs or unfair treatment because of a person's race, ethnicity, disability, age, sex, gender reassignment, religion or belief, sexual orientation, marriage and civil partnership, or pregnancy and maternity.

Organisational abuse includes neglect and poor care practice within an institution, service or care setting, including hospitals, care homes and domiciliary care. It may result from poor professional practice or from the structure, policies, processes and culture of 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 and Acts of Omission - Neglect includes ignoring medical, emotional or physical care needs, failing to provide access to appropriate health, social care or

educational services, and withholding necessities such as medication, adequate nutrition, heating or hydration.

Psychological or emotional abuse includes threats, humiliation, blaming, controlling behaviour, intimidation, coercion, harassment, verbal abuse, cyber-bullying, isolation, or the withdrawal of services or supportive relationships.

Additional forms of abuse, exploitation and harm that may affect adults at risk include:

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 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.'

Online/Cyber Abuse - including fraud, grooming, scams, and coercion through social media or messaging platforms. May be used for financial, sexual, or emotional exploitation. 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 several 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 Act's

The Domestic Abuse Act 2021 - which broadens the definition of domestic abuse to include coercive and controlling behaviour and recognises 'personally connected' individuals regardless of gender or setting.

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 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 consider 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 GTFC and GTF staff or volunteers to decide 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.

Capacity is the ability to decide at a particular time. The starting assumption must always be that a person has the capacity to decide, 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 decide at a certain time may be able to make that decision later - this may be due to illness or accident.

Consent Issues

Adults have the right to make unwise decisions. Mental capacity must not be confused with poor judgement. Staff must not assume a safeguarding issue simply because someone decides that others disagree with.

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 encounters. 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, e.g. 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.

Good Practice

All GTFC and GTF employees, workers, agency staff and volunteers working with vulnerable adults, children and 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 adult at risk first. For example, in adverse weather conditions of cold or heat. If the weather is cold or wet, ensure that the adult 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
- 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 adult at risk. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the adult at risk's consent has been given
- If groups must be supervised in changing rooms always ensure coaches work in pairs
- Coaches are qualified and a qualified first aider, is in attendance. Ensure that at away events adults should not enter a adult at risk'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
- 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.

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.

- Ensure vulnerable adults or young person's safety
- Always treat any allegations extremely seriously and act towards the adult as if you believe what they are saying, although do not directly say the words "I believe you"
- Tell the vulnerable adults they are right to tell you

- Reassure the vulnerable adults that they are not to blame
- Be honest about your own position, who you must tell and why
- Tell the vulnerable adults 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 able 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 within 24 hours
- Seek medical advice if necessary

Do not:

- Make promises you cannot keep or to keep secrets
- Interrogate the vulnerable adults - it is not your job to carry out an investigation - this will be up to the Police and Adults's Services 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 vulnerable adults feel responsible for the abuse
- Inform family or 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 Safeguarding Manager or Senior Safeguarding Manager for the specific activity in which the incident or concern arises should be consulted. In the absence of the Safeguarding Manager 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 Safeguarding Manager 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 Northeast 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 GTFC, 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.

Recording Allegations or Suspensions

A safeguarding concern should be referred to the local authority where there is reasonable cause to suspect that an adult:

- Has needs for care and support,
- Is experiencing or at risk of abuse or neglect, and
- Is unable to protect themselves due to those needs.

Although GTFC 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 My Concern. 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 adult at risk, concerned is immediately removed from any possible risk of harm. Investigations into possible abuse will require careful management. In these cases, the Safeguarding Manager 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 adult's next of kin or representative.

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.

Allegations against members of staff

If the report involves an allegation about any member of the GTFC and GTF 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 an adult or may have harmed an adult at risk
- Possibly committed a criminal offence against or related to an adult; or
- Behaved towards vulnerable adults in a way that indicates he or she is unsuitable to work with them, then the Safeguarding Senior Manager or Safeguarding Manager 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.
- Where the Safeguarding Senior Manager or Safeguarding Manager 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 Safeguarding Manager.

Where may harm occur?

Harm may occur anywhere in a GTFC or GTF 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 GTFC/GTF 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 GTFC 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 GTFC/GTF 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 GTFC/GTF activities.

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 or adult at risk (although this does not necessarily mean that the parents / carers must be told).

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 vulnerable adult is protected.

Related Policies and Documents:

GTFC/GTF will also have in place the following policies, related to this policy, they are being.

- Safeguarding Children's Policy
- Equality Policy
- Prevent Policy
- GDPR Policy
- Anti-Bullying Policy
- Safer Recruitment Policy
- Code of Conducts
- Complaints Policy

Adult Designated Safeguarding Manager

There is a Designated Adult Safeguarding Manager (DASM) who oversees and manages allegations against professionals in a 'position of trust' with adults. A position of trust refers to roles where individuals have direct responsibility or influence over adults at risk, including coaching, transportation, supervision, personal care, or safeguarding duties. (a DASM) who oversees and manages allegations against professional's who are in a "Person In a Position Of Trust" with adult's.

Contact details

Stewart Watson (Designated Adult Safeguarding Manager)
North East Lincolnshire Council, 3 Town Hall Square, Grimsby, DN31 1HX
Mobile: 07736 195008 Email: Stewart.Watson@nelincs.gov.uk

Who can I contact?

Polly Bancroft, Chief Executive Officer	07918 363428 Polly@gtfc.co.uk
Adam Smith, Senior Safeguarding Manager	07415454153 Adamsmith@gtfc.co.uk
Vikki Harries, Safeguarding Manager	07498 926776 safeguarding@gtfc.co.uk
Tara Lawson, Safeguarding & Incident manager EFL Trust	07964 905652 tlawson@efltrust.com
Sarah Boyer, Regional Safeguarding Manager, EFL	07583 138032 sboyer@efl.com
NEL Local Authority Safeguarding Officer	01472 326118

Ben Pearce, Lincolnshire County FA DSO	01522 596580 Ben.Pearce@lincolnshirefa.com
FA/NSPCC Safeguarding	0808 500 5000 (24 hrs)
FA Safeguarding Management Team	0800 169 1863 #6300

Additional Key Contacts

- North East Lincolnshire Safeguarding 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

GTFC's and GTF's Lead Designated 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

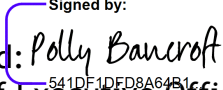
The LADO (Emma Horton), the CEO of GTFC/GTF, SSM of GTFC and Head of Community approved the contents of this policy which will be reviewed annually, or sooner due to changes in legislation or lessons learned from any public enquiry into safeguarding issues.

Signed: 
(Foundation Director)

Dated 21st Sept 2026

Signed: 
Safeguarding Manager

Dated: 10/09/2026

Signed by:
Signed: 
(Chief Executive Officer)
541DF1DFD8A64B1

Dated: 9/22/2026